

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NAUTILUS INSURANCE COMPANY :

v. :

MOTEL MANAGEMENT SERVICES, :
INC. d/b/a NESHAMINY INN, and :
THE MARY ETZRODT REAL :
ESTATE TRUST, and NI45, LLC, and :
E.B. :

NO. 2:20-cv-00289-PBT

ORDER

AND NOW, this day of , 2020, upon consideration of the Motion for Leave to File a Redacted Version of Exhibit F to Nautilus's Motion for Judgment on the Pleadings, and any responses hereto, it is hereby ORDERED and DECREED that said motion is **GRANTED**. Nautilus is permitted to replace Exhibit F of its Motion for Judgment on the Pleadings with a redacted version of that exhibit. The Clerk of Court is instructed to replace Exhibit F of Nautilus's Motion for Judgment on the Pleadings, ECF No. 27, with Exhibit B of the motion which is the subject of this Order.

BY THE COURT:

Petrese B. Tucker, J.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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v. :

MOTEL MANAGEMENT SERVICES, :
INC. d/b/a NESHAMINY INN, and :
THE MARY ETZRODT REAL :
ESTATE TRUST, and NI45, LLC, and :
E.B. :

NO. 2:20-cv-00289-PBT

**MOTION FOR LEAVE TO FILE A REDACTED VERSION OF EXHIBIT F TO
NAUTILUS’S MOTION FOR JUDGMENT ON THE PLEADINGS**

Plaintiff, Nautilus Insurance Company (“Nautilus”), by and through its attorneys, Bennett, Bricklin & Saltzburg, LLC, hereby moves for leave to file a redacted version of Exhibit F to its Motion for Judgment on the Pleadings, ECF No. 27, and in support thereof avers as follows:

1. This is an action seeking a declaratory judgment to resolve disputes over insurance coverage with regard to whether Nautilus is obligated to defend or indemnify Motel Management Services, Inc., The Mary Etzrodt Real Estate Trust and NI45, LLC, (“the Motel Management defendants”), in a matter currently pending in the Philadelphia County Court of Common Pleas captioned *E.B. v. Motel 6 Operating L.P., et al.*, Civil Action No. 170500487, (“the underlying action”).

2. Nautilus and the Motel Management defendants both filed motions for judgment on the pleadings on June 5, 2020. Nautilus attached the deposition transcript of E.B. as Exhibit F to its Motion in its entirety.

3. Subsequently, on June 22, 2020, counsel for E.B. wrote to undersigned counsel expressing concern for E.B.’s personal safety and notifying undersigned counsel that the exchange of the deposition transcript is governed by a Confidentiality Agreement in the underlying action that protects the disclosure of E.B.’s identity and home address. *See* Ex. A, Confidentiality

Agreement. Undersigned counsel was previously unaware of the attached Confidentiality Agreement.

4. Nautilus came into possession of the transcript on October 11, 2018 when it was filed unredacted as an exhibit to Motel Management Services, Inc.'s Motion for Relief from Final Judgment and Order in *Nautilus Insurance Company v. Motel Management Services, Inc., et al.*, C.A. No. 2:17-CV-04491-TJS. That filing is still unredacted and currently publicly available. E.B.'s unredacted deposition transcript is also currently publicly available on the docket for Motel Management's appeal to the Third Circuit Court of Appeals, since it was a part of Motel Management's appendix.

5. Nevertheless, in view of the concerns expressed by E.B.'s counsel for her personal safety, Nautilus hereby moves for leave to file a redacted version of E.B.'s deposition transcript in this case, attached hereto as Exhibit B, which removes all references to E.B.'s identity (i.e. name and date of birth) and home address, pursuant to the Confidentiality Agreement attached hereto as Exhibit A.

WHEREFORE, Nautilus Insurance Company respectfully requests that this Honorable Court grant its motion for leave to file a redacted version of exhibit F to its motion for judgment on the pleadings and enter the order attached hereto.

BENNETT, BRICKLIN & SALTZBURG LLC



BY: _____

LOUIS E. BRICKLIN

Attorney I.D. No. 20281

SARAH E. CROSLY

Attorney I.D. No. 325916

Centre Square, West Tower

1500 Market Street, 32nd Floor

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215-665-3400

bricklin@bbs-law.com

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NO. 2:20-cv-00289-PBT

MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S
MOTION FOR LEAVE TO FILE A REDACTED VERSION OF EXHIBIT F TO ITS
MOTION FOR JUDGMENT ON THE PLEADINGS

Plaintiff incorporates the facts and arguments set forth in its Motion for Leave to File a Redacted Version of Exhibit F to its Motion for Judgment on the Pleadings.

Respectfully Submitted,

BENNETT, BRICKLIN & SALTZBURG LLC



BY: _____

LOUIS E. BRICKLIN

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NO. 2:20-cv-00289-PBT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document has been filed electronically and is available for viewing and downloading from the ECF System by all interested counsel.

BENNETT, BRICKLIN & SALTZBURG LLC



BY: _____

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SARAH E. CROSLEY

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EXHIBIT A

| | | |
|--------------------------------|---|-----------------------|
| E.B. | : | PHILADELPHIA COUNTY |
| | : | COURT OF COMMON PLEAS |
| Plaintiff, | : | |
| v. | : | CIVIL TRIAL DIVISION |
| | : | MAY TERM, 2017 |
| | : | NO.: 00487 |
| MOTEL 6 OPERATING L.P., et al. | : | |
| | : | JURY TRIAL DEMANDED |
| | : | |
| Defendants | : | |

CONFIDENTIALITY AGREEMENT

WHEREAS, Plaintiff E.B. has brought an action against Motel 6 Operating L.P., Motel 6, Inc., Motel 6 L.P., G6 Hospitality LLC, G6 Hospitality Property LLC, Neshaminy Inn, Motel Management Services, Inc., and Motel Management Services (individually "Party" or collectively "Parties") in the Philadelphia Court of Common Pleas (the "Court"), assigned Case Identification Number 170500487 (the "Action").

WHEREAS, through discovery, it is anticipated that the Parties will disclose information that Plaintiff considers confidential, private, or personal ("Confidential Material");

WHEREAS, Plaintiff asserts that victims of human trafficking face dangers to their safety from revealing personally identifying information or their names, which are protected from public disclosure during criminal prosecutions of human trafficking under 18 Pa.C.S.A. § 3019;

WHEREAS, Plaintiff desires to keep disclosed Confidential Material confidential to the maximum extent possible; and

IT IS HEREBY AGREED by the Parties that the following clauses of this Agreement shall govern the disclosure of Confidential Material in this action, including but not limited to, the handling of documents, deposition testimony, deposition exhibits, deposition transcripts, written discovery requests, interrogatory responses, responses to requests to admit, and responses to requests for documents, and any other information or material produced, given, or exchanged including any information contained therein or derived therefrom ("Discovery Material") by or among any Party or non-party providing Discovery Material in this action.

Treatment of Confidential Material

1. Any personally identifying information of Plaintiff E.B. (including, but not limited to, name, date of birth, social security number, phone number, address, employment or familial history) shall be deemed Confidential Material.

2. The Party producing Discovery Material as part of this litigation shall designate to the other Parties which Discovery Material contains Confidential Material by using a bates-label or mark with the word "Confidential" in the bottom left corner of the page of the document containing Confidential Material. If the Parties receiving the Discovery Material have questions regarding which parts of the page contain Confidential Material, the Party producing the Discovery Material shall identify the sentences, paragraphs, or clauses on the page containing Confidential Material.
3. Except with the prior written consent of the producing Party, or upon prior order of the Court obtained after notice to the receiving Party's counsel, Confidential Material shall not be disclosed by the receiving Party's counsel to any person other than: a) the named Parties in this action and in the case of named parties that are entities, employees of such parties, b) counsel for the Parties and regular employees of such counsel; c) experts and consultants retained for the prosecution of this Action and employees of such experts; d) employees of insurers of named parties; e) investigators engaged by named parties; or f) court reporters and videographers engaged to record depositions conducted in this case. If a receiving Party's counsel discloses Confidential Material to any person to whom disclosure is permitted by this paragraph, the receiving Party's counsel must explain to the person the contents of this Agreement, and secure the consultant's written agreement to abide by the terms of this Agreement. The receiving party's counsel must retain said written agreement. Confidential Material shall not be used or disclosed by a Party's counsel for any purpose other than in connection with this Action.
4. Nothing in this agreement is intended to prevent a Party from using Confidential Information in subpoenas to obtain documents or things from third parties as part of the discovery process in this litigation. The preferred method of using Confidential Information would be the use of Plaintiff's initials, but it is understood that Parties will be required to disclose Confidential Information, such as a name, date of birth, or social security number, to subpoenaed third-parties in order to ensure the production of documents and things. If documents are filed with the Court related to the subpoena, such as a Notice of Intent to Serve a Subpoena, Certificate Prerequisite to Service of a Subpoena, or a Subpoena with attached Addenda, the Party filing the documents must redact all Confidential Information and use Plaintiff's initials in court filings.
5. If a Party's counsel intends to use any documents containing Confidential Material in any deposition or otherwise publish or make available such documents to any individual other than the named Parties, Parties' counsel, their staff, or experts and consultants retained for the prosecution of this Action, the Party's counsel must redact all Confidential Material from such documents.
6. To the extent that testimony is sought concerning Confidential Material during any deposition or in any other pre-trial venue, any Party may exclude any person from the deposition or other venue during such testimony if the Confidential Material may not be disclosed to such person under the terms of this Agreement.

7. Any Confidential Material disclosed in this Action is to be considered confidential to the producing Party, and any Parties receiving the Confidential Material shall hold the same confidence and shall not use any disclosed Confidential Material other than for the purposes of supporting its position in this Action.
8. If Confidential Material is disclosed through inadvertence or otherwise to any person not authorized under this Agreement, the Party causing such disclosure shall inform the person receiving the Confidential Material that the information is covered by this Agreement, make its best efforts to retrieve the Confidential Material, and promptly inform the producing Party of the disclosure.
9. The Parties receiving Confidential Material shall have no confidentiality obligations with respect to any information which:
 - a. is or becomes publicly known otherwise than by the receiving Party's breach of this Agreement;
 - b. is received by a Party without restriction from a third party who is not under an obligation of confidentiality;
 - c. is approved for release by written authorization of the Plaintiff E.B.'s counsel; or
 - d. is disclosed by the receiving Party pursuant to judicial action, provided that producing Party is notified at the time such action is initiated.
10. Any pleading, brief, memorandum, motion, letter, affidavit, or other document filed with the Court (a "Filing") must redact Confidential Material and use Plaintiff's initials.
11. In the event additional Parties join or are joined in this Action, they shall not have access to Confidential Material until the newly joined Party by its counsel has executed this Agreement.


General Provisions

12. This Agreement terminates and supersedes all prior understandings or agreements on the subject matter hereof.
13. Nothing herein shall prevent any Party from applying to the Court for a modification of this Agreement should the moving party believe the Agreement, as originally agreed upon, is hampering its efforts to prepare for trial or to otherwise protect its interests; or from applying to the Court for further or additional protections; or from an Agreement between the Parties to any modification of this Agreement, subject to the approval of the Court.
14. This Agreement is not intended to govern the use of Confidential Material at any trial of this action. Questions regarding the protection to be afforded Confidential Material during trial shall be presented to the Court prior to publication of the information at trial or otherwise.

15. The Parties do not, by this Agreement, waive any objections the Parties might otherwise have under the rules of discovery or evidence.

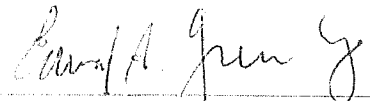
16. This Agreement shall survive the final termination of this case regarding any retained documents or contents thereof.

KLINE & SPECTER, P.C.


THOMAS R. KLINE, ESQ.
NADEEM A. BEZAK, ESQ.
EMILY B. MARKS, ESQ.
Attorneys for Plaintiff E.B.

Date: _____

WARD GREENBERG HELLER & REIDY LLP


EDWARD A. GREENBERG, ESQ.
KATHERINE A. HOPKINS, ESQ.
BENJAMIN D. HARTWELL, ESQ.
*Attorneys for Defendants Motel 6
Operating, L.P., G6 Hospitality LLC,
and G6 Hospitality Property LLC*


Date: 8/10/17

KURTZ & REVNESS, P.C.

MICHAEL J. REVNESS, ESQ.
GEORGE J. EATZ, ESQ.
*Attorneys for Defendants Motel Management
Services, Inc. v/a Neshaminy Inn and Motel
Management Services*

Date: 8/7/17

BEGLEY, CARLIN & MANDIO, LLP


DOUGLAS C. MALONEY, ESQ.
*Attorney for Defendant Neshaminy
Inn a/k/a Neshaminy Motor Inn*

Date: 8/7/17

15. The Parties do not, by this Agreement, waive any objections the Parties might otherwise have under the rules of discovery or evidence.
16. This Agreement shall survive the final termination of this case regarding any retained documents or contents thereof.

KLINE & SPECTER, P.C.

WARD GREENBERG HELLER & REIDY LLP

THOMAS R. KLINE, ESQ.
NADEEM A. BEZAR, ESQ.
EMILY B. MARKS, ESQ.
Attorneys for Plaintiff E.B.

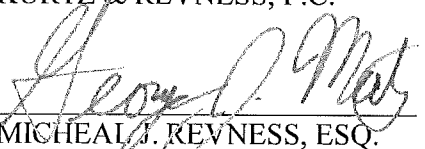
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Date: _____

Date: _____

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DOUGLAS C. MALONEY, ESQ.
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Inn a/k/a Neshaminy Motor Inn*

Date: 8/7/17

Date: _____

WADE CLARK MULCAHY, LLP

/s/ Matthew Care

ROBERT J. COSGROVE, ESQUIRE
MATTHEW C. CARE, ESQUIRE
GABRIELLE OUTLAW, ESQUIRE
*Attorneys for Defendants, The Mary
Etzrodt Real Estate Trust and NI45, LLC*

6/24/2020

Date: _____

EXHIBIT B

In The Matter Of:

E.B. v.

MOTEL 6 OPERATING, L.P., et al.



August 23, 2018

Donna A. Bittner Reporting

856-768-6619

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

E.B. : May Term, 2017
vs. :
MOTEL 6 OPERATING, L.P., :
et al. : No. 00487

Philadelphia, Pennsylvania

Thursday, August 23, 2018

Videotape deposition of [REDACTED]

[REDACTED], taken pursuant to notice, at the offices of
Ward Greenberg Heller & Reidy, LLP, 1835 Market
Street, Suite 650, Philadelphia, Pennsylvania, on
the above date, beginning at 10:04 a.m., before
Donna A. Bittner, RMR-CRR.

DONNA A. BITTNER REPORTING
REGISTERED PROFESSIONAL REPORTERS
61 Penn Road
Voorhees, New Jersey 08043
donnabittner.rmr@gmail.com
(856) 768-6619

Donna A. Bittner Reporting

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Counsel for Defendants Neshaminy Inn
a/k/a Neshaminy Motor Inn, Motel
Management Services, Inc., and Motel
Management Services.

ALSO PRESENT:

LISA WASHINGTON-WATTS, ESQUIRE
Corporate Counsel, G6 Hospitality LLC

BRIAN SACK
Video Specialist

I N D E X

WITNESS: PAGE

By Mr. Greenberg ----- 6, 350

By Ms. O'Connell ----- 292

- - -

EXHIBITS DESCRIPTION PAGE

EB-1 Bensalem Township Police Incident
Report Form BTPD1-BTPD61 ----- 139

EB-2 Handwritten envelope addressed
to Quan Davis with attached letter
(5 pages) ----- 209

EB-3 Joseph J. Peters Institute
Psychological Evaluation dated
5/11/2016 MMS JJPI 0002-0018 ---- 262

EB-4 Y-HEP Health Center records
Y-HEP000001-000030 ----- 278

EB-5 Defendant's Sentencing Memorandum
(66 pages) ----- 286

EB-6 Color copy of photograph ----- 287

EB-7 Google Maps Image of Neshaminy
Inn 8/22/2018 ----- 327

EB-8 Color copy of photograph ----- 327

- - -

INSTRUCTIONS NOT TO ANSWER:

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PAGE 244:22

PAGE 245:4

- - -

VIDEO SPECIALIST: We are now on the video record. The time is 10:04 a.m. This is the videotape deposition of [REDACTED] [REDACTED] taken by the defense in the matter of E.B. versus Motel 6 Operating, L.P., et al, in the Court of Common Pleas, Philadelphia County, May Term, 2017, No. 00487.

The deposition is being held in the offices of Ward Greenberg at 1835 Market Street in Philadelphia, Pennsylvania. My name is Brian Sack. I am the videographer from Trust Tech Legal in Philadelphia, Pennsylvania. The court reporter is Donna A. Bittner of Donna A. Bittner Reporting.

The attorneys will now introduce themselves for the record.

MR. GREENBERG: Edward Greenberg for the Motel 6 defendants.

MR. HARTWELL: Ben Hartwell for the Motel 6 defendants.

MS. ADERINTO: Debbie Aderinto for the Motel 6 defendants.

MR. MORGENSTERN: John Morgenstern

for the Neshaminy Inn defendants.

MS. O'CONNELL: Penelope O'Connell
for the Neshaminy Inn defendants as well.

MR. GREENBERG: Also with the
Motel 6 defendants is our client, our
client's in-house counsel, Lisa
Washington-Watts, from Texas.

MR. BEZAR: Nadeem Bezar for the
plaintiff.

MS. MARKS: Emily Marks for the
plaintiff.

VIDEO SPECIALIST: The reporter
will now swear in the witness, please.

- - -

...

after having been duly sworn, was examined
and deposed as follows...

- - -

MR. GREENBERG: Counsel, usual
stipulations satisfactory?

MR. BEZAR: That's fine.

MS. O'CONNELL: Yes.

1 BY MR. GREENBERG:

2 Q. Good morning, Ms. [REDACTED]

3 A. Good morning.

4 Q. If I want to address you by your last
5 name, is it just Ms. [REDACTED] or is it Ms. [REDACTED]

6 [REDACTED]
7 A. Ms. [REDACTED]

8 Q. Ms. [REDACTED] thank you.

9 My name is Edward Greenberg. We
10 have not met before; correct?

11 A. Yes.

12 Q. Okay. Did you hear the introductions in
13 which I said that I represent the Motel 6
14 defendants?

15 A. Yes.

16 Q. Okay. Are you under the influence of
17 any medications today?

18 A. No.

19 Q. Are you able to hear and answer
20 questions in this room today?

21 A. Yes.

22 Q. I'm going to give you a few preliminary
23 instructions, and I may remind you of them as
24 the day progresses.

The first one is, if you don't know the answer to a question, you can just tell us that and that will be a satisfactory answer as long as it's true.

Do you understand that?

A. Yes.

Q. And if you don't remember the answer to a question, you can tell us that and that will be a satisfactory answer as long as it's a true answer.

Do you understand that?

A. Yes.

Q. If you have some memory from which you can give us a partial answer to a question, we do want that. Okay?

A. Yes.

Q. We're going to need to speak one at a time so the court reporter can make a stenographic record of the questions and answers and any objections that are made as we go forward today, so I'm going to ask you to try to wait until I finish my entire question before you start your answer, and I will try to wait until you finish your answer

1 before I ask my next question.

2 Okay?

3 A. Yes.

4 Q. Now, you've taken an oath today, and I
5 just want to disclose to you that if you fail
6 to provide true, accurate and complete
7 answers to any question that you're asked,
8 the lawyer on the other side of the case, a
9 lawyer for a defendant may try to use that
10 against you at trial.

11 Do you understand that?

12 A. Yes.

13 Q. Your full name is [REDACTED]

14 A. [REDACTED]

15 Q. [REDACTED] thank you.

16 VIDEO SPECIALIST: I'm sorry. I
17 need to go off the record for one moment.

18 MR. GREENBERG: We're going off
19 the record.

20 VIDEO SPECIALIST: Off the record
21 at 10:08.

22 (Discussion held off the record.)

23 VIDEO SPECIALIST: We are back on
24 the video record at 10:09.

[REDACTED]

1 BY MR. GREENBERG:

2 Q. Ms. [REDACTED] what is your date of birth?

3 A. [REDACTED]

4 Q. What is your current address?

5 A. [REDACTED]

6 Q. You're speaking somewhat softly. I want
7 to make sure everybody can hear you.

8 MS. O'CONNELL: It's a little
9 tough.

10 MR. GREENBERG: It is a little
11 hard.

12 BY MR. GREENBERG:

13 Q. Try to keep your voice up. The people
14 at the end of the table are having a little
15 trouble hearing you.

16 A. Okay.

17 Q. Even I'm having a little trouble and I'm
18 directly across from you.

19 A. Okay.

20 Q. I think you said your address is [REDACTED]

21 [REDACTED] --

22 A. [REDACTED].

23 Q. [REDACTED]?

24 A. Yes.

1 Q. That's in Philadelphia?

2 A. Yes.

3 Q. Is that South Philadelphia?

4 A. North Philadelphia.

5 Q. North. Are you living in an independent
6 situation or in some kind of a group home or
7 something else?

8 A. I live with my mother.

9 Q. And what is your mother's name?

10 A. Shellyn, S-H-E-L-L-Y-N, Singleton-El.

11 Q. How long have you been living with your
12 mother?

13 A. About four months now.

14 Q. Where were you before that?

15 A. Foster care.

16 Q. In which particular residence? I
17 understand from seeing DHS records that
18 you've been in various locations under DHS
19 supervision; correct?

20 A. Yes.

21 Q. So the one you were in before you moved
22 in with your mother was where?

23 A. Germantown.

24 Q. Was that with a foster mother?

1 A. Oh, yes, yes.

2 Q. Which one?

3 A. You mean --

4 MR. BEZAR: You mean what's her
5 name?

6 MR. GREENBERG: Yes.

7 THE WITNESS: Reena Neeley.

8 BY MR. GREENBERG:

9 Q. Ms. Neeley?

10 A. Yes.

11 Q. You've lived with her for various
12 periods of time over the years; correct?

13 A. Only twice.

14 Q. Two times only?

15 A. Yes.

16 Q. For how long each time?

17 A. The first time three months, the second
18 time five months.

19 Q. The most recent one before you moved in
20 with your mother, was that the three-month
21 period or the five-month period?

22 A. The five-month period.

23 Q. At Ms. Neeley's house how many foster
24 children, I'll call them, can she

1 accommodate, do you know?

2 A. No.

3 Q. How many have lived there with you?

4 A. One.

5 Q. Only one at a time?

6 A. Yeah.

7 Q. And has that changed or has it always
8 been the same person?

9 A. Changed.

10 Q. Who was the most recent one?

11 MR. BEZAR: You want her to
12 identify the names of other minors living in
13 foster care?

14 MR. GREENBERG: To the extent
15 they could be witnesses to her situation,
16 yes.

17 MR. BEZAR: Okay.

18 MR. GREENBERG: Please.

19 THE WITNESS: Her first name is
20 Tiyanna. That's all I know.

21 BY MR. GREENBERG:

22 Q. You don't know her last name?

23 A. No.

24 Q. How long did you live with her?

1 A. Five months.

2 Q. Were there any other foster children
3 that you lived with for a significant period
4 of time, more than a few weeks, in
5 Ms. Neeley's house?

6 A. Yes.

7 Q. Who?

8 A. I don't remember any.

9 Q. You have some children?

10 A. Yes.

11 Q. How many?

12 A. Two.

13 Q. What are their names?

14 A. Afia and Zion.

15 Q. And who?

16 A. Zion.

17 Q. Is Zion a boy?

18 A. Yes.

19 Q. And Afia is a girl?

20 A. Girl.

21 Q. We've seen in the records a reference to
22 your daughter as Afua, A-F-U-A. Can you
23 explain that? Was there a name change or
24 something?

1 A. No.

2 Q. Was she given an incorrect name on her
3 birth certificate or some other document?

4 A. Yes.

5 Q. Tell us what happened with that.

6 A. I'm not sure.

7 Q. Well --

8 A. I don't remember.

9 Q. Was it the birth certificate or
10 something else that caused confusion with her
11 name?

12 A. I believe it was the birth certificate.

13 Q. The birth certificate showed what?

14 A. It misspelled her first name.

15 Q. How did it spell her first name?

16 A. A-D-I-A.

17 Q. A-D-I-A?

18 A. Yes.

19 Q. Instead of A-F-I-A?

20 A. Yes.

21 Q. And has that been corrected?

22 A. No.

23 Q. So you call her Afia, A-F-I-A?

24 A. Yes.

1 Q. But her birth certificate says Adia,

2 A-D-I-A?

3 A. Yes.

4 Q. What is her date of birth?

5 A. 12/2/16.

6 Q. December 2nd, 2016?

7 A. December 2nd, 2016, yes.

8 Q. And what is Zion's date of birth?

9 A. November 23rd, 2017.

10 Q. Do you have a child named Malikee?

11 A. No.

12 Q. You've never had a son named Malikee?

13 A. No.

14 Q. Who is Afia's father?

15 A. Malik.

16 Q. Malik?

17 A. Yes.

18 Q. Last name?

19 A. Brookins.

20 Q. And who is Zion's father?

21 A. Malik Brookins.

22 Q. Have you ever had a child with any other
23 man?

24 A. No.

1 Q. Who lives with you at your mother's
2 house besides your mother, if anyone?

3 A. Her boyfriend.

4 Q. What's his name?

5 A. Jamar Hewlett.

6 Q. Sorry?

7 A. Jamar Hewlett.

8 Q. J-A-M-A-R?

9 A. H-E-W-L-E-T-T.

10 Q. How long has he lived with you?

11 A. The entire time. The entire time at my
12 mother's house.

13 Q. Well, you've lived with your mother on
14 various, for various periods of time in your
15 life?

16 A. Yes.

17 Q. Correct?

18 A. Yes.

19 Q. Has Jamar Hewlett lived with you at
20 times other than this last five months?

21 A. Yes.

22 Q. When?

23 A. The last time before I went back into
24 foster care and before I was put in DHS care.

1 Q. Before you were put into DHS care at
2 what age were you?

3 A. 14.

4 Q. I'm going to ask a better question than
5 that. That was a very poor question.

6 How old were you when you first
7 went into foster care?

8 A. 15.

9 Q. 15. So before you went into foster care
10 at the age of 15 --

11 A. Yes.

12 Q. -- Jamar Hewlett was part of the
13 household that you lived in with your mother?

14 A. Yes.

15 Q. At what age, again I'm going to fix
16 that, how old were you when Jamar Hewlett
17 first became part of your mother's household?

18 MR. BEZAR: Objection to the
19 form. You can answer.

20 THE WITNESS: Um, 13.

21 BY MR. GREENBERG:

22 Q. Did your mother have other husbands or
23 boyfriends living in the house with you
24 before that?

1 MR. BEZAR: Objection to the
2 form. You can answer.

3 THE WITNESS: Yes.

4 BY MR. GREENBERG:

5 Q. And who were they?

6 A. His name is Lester Threats.

7 Q. Sorry?

8 A. His name is Lester Threats.

9 Q. Is that L-E-S-T-E-R?

10 A. Yeah.

11 Q. T-H-R-E-A-T?

12 A. Yes.

13 Q. Is there an S on the end?

14 A. Yes.

15 Q. Threats?

16 A. Yes.

17 Q. Anyone else?

18 A. No.

19 Q. How old were you when he became part of
20 the household?

21 A. Eight.

22 Q. And how old were you when he left the
23 household?

24 A. 12.

1 Q. Have you ever referred to anyone as your
2 stepfather?

3 A. Yes.

4 Q. Who?

5 A. Jamar Hewlett.

6 Q. Do you know his age?

7 A. No.

8 Q. Do you know his occupation?

9 A. Janitor.

10 Q. Where does he work?

11 A. I don't know.

12 Q. Do you know Mr. Threats' age?

13 A. No.

14 Q. Do you know his occupation?

15 A. No.

16 Q. Do you know where he is now?

17 A. No.

18 Q. Shellyn Singleton-El is your biological
19 mother?

20 A. Yes.

21 Q. Who is your biological father?

22 A. Cornell Butler, C-O-R-N-E-L-L Butler.

23 Q. Do you know his age?

24 A. No.

1 Q. Do you know his occupation?

2 A. Nurse aide.

3 Q. Do you know his address?

4 A. No.

5 Q. Do you know approximately where he
6 lives?

7 A. 15th and Westmoreland.

8 Q. Is that in North Philadelphia?

9 A. Yes.

10 Q. Have you been to his home?

11 A. Yes.

12 Q. Do you have any kind of a relationship
13 with your biological father?

14 A. Yes.

15 Q. When did that start?

16 A. When I was 16.

17 Q. How did it start?

18 A. We found each other.

19 Q. How?

20 A. Through Facebook.

21 Q. You found him or he found you?

22 A. He found me.

23 Q. And has that relationship continued to
24 this point today?

1 A. Yes.

2 Q. Does anyone else live with you and your
3 mother and Mr. Hewlett?

4 A. No.

5 Q. Do you have any sisters or half sisters?

6 A. Yes.

7 Q. Or brothers or half brothers?

8 A. Yes.

9 Q. How many?

10 A. Four brothers and four sisters.

11 Q. Can you give me their names?

12 A. Adwoa, A-D-W-O-A, Akua, A --

13 Q. Before we go to another one, let's do it
14 this way. When you give me the name --

15 A. Yes.

16 Q. -- give me male, female, and if you know
17 the approximate age or the exact age, tell me
18 that.

19 A. Female, 18. Akua, A-K-U-A, female, 13,
20 Shareeka, S-H-A-R-E-E-K-A, 24, female.

21 Sorry. I don't know the other names.

22 Q. Sorry?

23 A. I don't remember the rest of their
24 names.

1 Q. So there is a sister whose name you
2 don't remember?

3 A. Yeah. Yes.

4 Q. And you don't know her age or you do?

5 A. 11.

6 Q. Okay. And the brothers?

7 A. No.

8 Q. You don't know their names?

9 A. No.

10 Q. Have you ever met them?

11 A. Yes.

12 Q. When?

13 A. When I was 16. When I was 16.

14 Q. Under what circumstances?

15 A. What do you mean by that?

16 Q. Birthday party, funeral, wedding?

17 A. Reunite.

18 Q. How?

19 A. Through my father at his house.

20 Q. Through your father what?

21 A. At his house.

22 Q. Do any of your siblings currently live
23 with your father?

24 A. Yes.

1 Q. Which ones?

2 A. The names I do not know.

3 Q. The four boys you think live with your
4 father?

5 A. Yes.

6 Q. And the sister whose name you can't give
7 me you think lives with your father?

8 A. Yes.

9 Q. Your three sisters that you have named,
10 do any of them live with your father?

11 A. No.

12 Q. Where does Adwoa live?

13 A. With her father.

14 Q. What's his name?

15 A. Eugene Jackson [REDACTED]

16 Q. Have you ever lived with him?

17 A. Yes.

18 Q. Who does Akua live with?

19 A. My aunt.

20 Q. What's her name?

21 A. Tawanda Johnson.

22 Q. Tawanda?

23 A. Yes.

24 Q. How do you spell that?

1 A. T-A-W-A-N-D-A.

2 Q. Tawanda Johnson?

3 A. Yes.

4 Q. Who does Shareeka live with?

5 A. I don't know.

6 Q. Do you know her whereabouts?

7 A. No.

8 Q. When did you first meet Malik?

9 A. I was 15.

10 Q. Where did you meet him?

11 A. On Facebook.

12 Q. How old is Malik?

13 A. 25.

14 Q. Are you now 20 or you're about to be 20
15 in October?

16 A. I'm 20.

17 Q. You'll be 21 in October?

18 A. Yes.

19 Q. Currently how is your relationship with
20 Malik?

21 A. There is no relationship.

22 Q. Did you have a relationship with him
23 that ended?

24 A. Yes.

1 Q. When?

2 A. Last year, August.

3 Q. Why did it end?

4 A. Because of domestic violence.

5 Q. Because of domestic violence?

6 A. Yes.

7 Q. Could you explain that?

8 A. He would -- he would, um, verbally and
9 physically abuse me every day.

10 Q. Were you living together at the time?

11 A. Yes.

12 Q. Where?

13 A. [REDACTED]

14 Q. I'm sorry?

15 A. [REDACTED]

16 Q. He lived with you at your mother's house
17 part of the time?

18 A. Yes.

19 Q. And he lived with you at [REDACTED] part
20 of the time?

21 A. Yes.

22 Q. Whose place was that, the Pine Street?

23 A. My apartment.

24 Q. Was that an apartment arranged through

1 DHS?

2 A. Yes.

3 Q. The individual living program or
4 something like that?

5 A. Yes.

6 Q. When did the verbal and physical abuse
7 by Malik begin?

8 A. A month after I came home from Vision
9 Quest.

10 Q. When was that?

11 A. February.

12 Q. February of what year?

13 A. 2016.

14 Q. Is Vision Quest -- let me ask it this
15 way. Strike that.

16 What kind of a residential
17 situation is Vision Quest?

18 A. It's a secure holding facility.

19 Q. So it's a place you cannot freely come
20 and go from, you're remanded to their custody
21 and you have to stay there until the court
22 orders that you can leave; is that accurate?

23 MR. BEZAR: Objection to the
24 form. You can answer.

THE WITNESS: Yes.

BY MR. GREENBERG:

Q. Is it secured by some kind of fencing or do they just use GPS or is there something else?

A. Key passes. Key pass. You got to swipe a key, like swipe a card (indicating).

Q. To get out?

A. Yes, to unlock the doors.

Q. So you're locked in?

A. Yes.

Q. You were there from when to when?

A. From May of 2015 all the way till January 2016.

Q. So less than a year?

A. Yes.

Q. What legal proceeding were you involved in that resulted in your going to Vision Quest?

MR. BEZAR: Objection to the form. You can answer.

BY MR. GREENBERG:

Q. I'm asking you what arrest or conviction or other charge resulted in you going to

1 Vision Quest.

2 MR. BEZAR: Objection to the
3 form.

4 THE WITNESS: I got into a fight.

5 BY MR. GREENBERG:

6 Q. This is the incident in Monroe County?

7 A. Yes.

8 Q. Pennsylvania?

9 A. Yes.

10 Q. Where were you living in Monroe County?

11 A. Child First Services.

12 Q. Was that also a secure residential
13 facility?

14 A. No.

15 Q. That was the place you could freely
16 enter and leave?

17 MR. BEZAR: Objection to form.

18 THE WITNESS: No.

19 BY MR. GREENBERG:

20 Q. Would you explain?

21 A. Um, it was like a campus and it was just
22 like after you left the campus it's nothing
23 but roads, and the roads, once you leave the
24 campus you're able.

1 Q. I see.

2 Where is Child First or the one
3 you were?

4 A. Lake Ariel.

5 Q. Lake where?

6 A. Lake Ariel, A-R-I-E-L.

7 Q. Where is that?

8 A. In the Poconos.

9 Q. Is that Monroe County?

10 A. Yes.

11 Q. Did an agency or a court send you there?

12 A. Yes.

13 Q. Which?

14 A. Judge Dumas.

15 Q. Court of Common Pleas of Philadelphia
16 County?

17 A. I don't know. What is --

18 Q. You've been in front of Judge Dumas?

19 A. Yes.

20 Q. Is he in the family court here in
21 Philadelphia?

22 MR. BEZAR: Objection to form.
23 Judge Dumas is a she and I think she's in
24 dependency court.

1 MR. GREENBERG: It sounds like
2 it's part of family court, but okay.

3 MR. BEZAR: It is not, it is
4 dependency court.

5 BY MR. GREENBERG:

6 Q. So Judge Dumas is here in Philadelphia?

7 A. Yes.

8 Q. You have appeared before her more than
9 once?

10 A. Yes.

11 Q. Is she the judge you went in front of in
12 connection with DHS residential placements?

13 MR. BEZAR: Objection to form.

14 THE WITNESS: Yes.

15 BY MR. GREENBERG:

16 Q. You said you were involved in a fight
17 while you were in Vision Quest; is that
18 correct?

19 A. No.

20 Q. No? While you were in Child First?

21 A. Yes.

22 Q. When and where did that happen?

23 A. East Stroudsburg Mall.

24 Q. How did you get involved in a fight

1 there?

2 A. An argument broke out and just -- an
3 argument broke out between the group, a group
4 that I was with and another group, and it
5 just ended up as a fight.

6 Q. What was the basis for the argument?

7 A. Somebody wouldn't be quiet in the movie
8 theater.

9 Q. Oh, it happened in a movie theater?

10 A. No, the fight happened outside the movie
11 theater, but something happened in the movie
12 theater that caused the fight outside of the
13 movie theater.

14 Q. Did the fight happen after the movie
15 ended or while the movie was still playing?

16 A. After the movie ended.

17 Q. Who started the fight?

18 MR. BEZAR: Objection to the
19 form.

20 MR. GREENBERG: What's wrong with
21 the form?

22 MR. BEZAR: Who started the
23 fight?

24 MR. GREENBERG: Yeah. How could

1 you ask that better?

2 MR. BEZAR: What are the
3 circumstances of the fight?

4 BY MR. GREENBERG:

5 Q. Who started the fight?

6 MR. BEZAR: Objection to the
7 form.

8 THE WITNESS: I don't know.

9 BY MR. GREENBERG:

10 Q. Did you start the fight?

11 A. No.

12 MR. BEZAR: That was a better way
13 to ask the question.

14 BY MR. GREENBERG:

15 Q. How did you get involved in the fight?

16 A. I was with a group of friends.

17 Q. You were with a group of friends and
18 there was an argument that started in the
19 movie theater?

20 A. Yes.

21 Q. After the movie was over, the two groups
22 of people were in a mall, is that what you're
23 saying?

24 A. Outside of the mall.

1 Q. Outside the mall. So this was an
2 outdoor fight?

3 A. Yes.

4 Q. How long did it last?

5 A. I don't know.

6 Q. What role, if any, did you have in this
7 fight?

8 A. What do you mean by that?

9 Q. Did you get hit? Did you hit someone
10 else?

11 A. Yes, both.

12 Q. Which happened first?

13 A. I got swung on.

14 Q. Somebody swung at you?

15 A. Yes.

16 Q. They missed?

17 A. Yes.

18 Q. Was it a male or a female?

19 A. A female.

20 Q. Were all the people involved in this
21 altercation female?

22 A. No.

23 Q. There were men and women?

24 A. Yes.

1 Q. Male and female?

2 A. Yes.

3 Q. In both groups?

4 A. No.

5 Q. Your group was what?

6 A. All women.

7 Q. The other group was male and female?

8 A. Yes.

9 Q. Was there an age difference?

10 A. Yes.

11 Q. How so?

12 A. There were -- we were all teenagers and
13 the majority of them were adults.

14 Q. When you say adults, can you give me an
15 age range?

16 A. Mid 40's, early 20's, late 50's.

17 Q. How big was their group?

18 A. About the same number.

19 Q. How many?

20 A. Six people.

21 Q. About six people?

22 A. Five, six people.

23 Q. And your group was about the same size?

24 A. Yes.

1 Q. Was anybody injured in this?

2 A. No, not that I -- no.

3 Q. So you said someone swung on you?

4 A. Yes.

5 Q. Was it a woman you said, a female?

6 A. Yes.

7 Q. And what did you do in response?

8 A. I swing back.

9 Q. And did you strike somebody?

10 A. Yes.

11 Q. How many times?

12 A. Three.

13 Q. Did you cause any injuries?

14 A. No.

15 Q. What part of the body did you strike?

16 A. Face.

17 Q. Three times?

18 A. Yes.

19 Q. Was there a court case arising from that
20 that you were involved in?

21 A. Yes.

22 Q. Did you have to appear somewhere?

23 A. Yes.

24 Q. Where?

1 A. I don't remember.

2 Q. Was it up there in the Poconos
3 somewhere?

4 A. Yes.

5 Q. How many times did you have to appear?

6 A. About three times.

7 Q. And what happened?

8 A. I just had to plead guilty.

9 Q. You did plead guilty?

10 A. Yes.

11 Q. To what?

12 A. Assault.

13 Q. Were you sentenced?

14 A. No.

15 Q. What happened after the guilty plea?

16 A. Nothing.

17 Q. You didn't have to pay a fine?

18 A. No.

19 Q. You weren't given probation or --

20 A. Yes. I was given probation.

21 Q. That's a sentence.

22 A. Oh, okay.

23 Q. Okay. Is that the only sentence you
24 got, probation?

1 A. Yes.

2 Q. Did this then have ramifications or
3 effects down here in Philadelphia?

4 MR. BEZAR: Objection to the
5 form.

6 THE WITNESS: No.

7 BY MR. GREENBERG:

8 Q. I'm going to re-ask it. That was a bad
9 question.

10 MR. BEZAR: It wasn't that bad,
11 just, you know --

12 BY MR. GREENBERG:

13 Q. Did --

14 MR. BEZAR: Hold on a second.
15 When you talk I try not to interrupt. Please
16 don't heisen (sic) me and I'll try not to
17 interrupt. If I'm doing it too much, I'll
18 slow down, Ed. Okay?

19 MR. GREENBERG: You objected. I
20 rephrased the question. We don't have to get
21 into a colloquy about it. Let's just keep
22 this rolling. I want to get through this.

23 BY MR. GREENBERG:

24 Q. So you were sentenced to probation after

1 this incident that you pled guilty to. Did
2 that have any effect with Judge Dumas?

3 MR. BEZAR: Objection to the
4 form.

5 THE WITNESS: No.

6 BY MR. GREENBERG:

7 Q. Or with --

8 A. What do you mean by that?

9 MR. BEZAR: That's why I objected
10 to the form. Go ahead.

11 BY MR. GREENBERG:

12 Q. Did you appear in front of Judge Dumas
13 at any time where what happened in the
14 Poconos was taken into consideration?

15 A. Yes.

16 Q. Okay. How so?

17 A. Well, the judge knew her, so the
18 judge -- you got -- can you rephrase the
19 question a little better?

20 Q. What if anything did Judge Dumas do
21 about what happened in the Poconos to your
22 knowledge?

23 A. I don't know.

24 Q. Did she talk to you about it?

1 A. No.

2 Q. Did she change your situation in any
3 way?

4 A. What do you mean by that?

5 Q. Did she do anything that affected where
6 you were living, what supervision you were
7 under?

8 A. Yes.

9 Q. Okay. Tell me what happened with it.

10 A. I was transferred to a more secure
11 facility.

12 Q. So you were transferred from --

13 A. From Child First to Vision Quest.

14 Q. Where was the Vision Quest facility
15 located?

16 A. In North Philadelphia.

17 Q. Can you tell me where?

18 A. 5201 Old York Road, 19141.

19 Q. How long were you at Child First?

20 A. Four months.

21 Q. Were you pregnant with your first child
22 while you were at Child First?

23 A. No.

24 Q. Were you pregnant with your first child

1 while you were at Vision Quest?

2 A. No.

3 Q. Where were you living when you got
4 pregnant with your first child?

5 A. My own apartment.

6 Q. Your own apartment?

7 A. Yes.

8 Q. Where was that located?

9 A. I don't remember.

10 Q. Somewhere in Philadelphia?

11 A. Yes.

12 Q. Was that your first independent living
13 situation while you were at DHS?

14 A. No.

15 Q. I'm going to try to reconstruct that a
16 little better later on in the deposition, so
17 I'll leave that right now.

18 You said your relationship with
19 Malik ended last August as a result of
20 physical and verbal abuse.

21 A. Yes.

22 Q. Did you break up with him or did he
23 break up with you?

24 A. I broke up with him.

1 Q. He had been living with you at that
2 time?

3 A. Yes.

4 Q. So you made him leave the home?

5 A. Yes.

6 Q. When have you last communicated with him
7 in any way? And that would be phone, text
8 message, Facebook, see him in person,
9 anything.

10 A. A few months ago.

11 Q. What were the circumstances?

12 A. He came to visit his children.

13 Q. Does he have visitation rights?

14 A. No.

15 Q. Do you have a protection from abuse
16 order against him?

17 A. No.

18 Q. Have you ever had one against him?

19 A. Yes.

20 Q. When did it end?

21 A. I don't remember.

22 Q. How did it end?

23 A. I got it removed.

24 Q. So you took steps to end it?

1 A. Yes.

2 Q. Why?

3 A. He started to go to therapy and show me
4 that he wanted to do better, so I took it off
5 before I had my son.

6 Q. I'd like to understand when he lived
7 with you in relation to the birth of your two
8 children. So your first child, your daughter
9 was born December 2nd, 2016?

10 A. Yes.

11 Q. Were you living with Malik before she
12 was born?

13 A. No.

14 Q. When did he move in with you?

15 A. When I left my first foster mother's
16 home after I had my daughter.

17 Q. What was your first foster mother's
18 name?

19 A. My first?

20 Q. The person you just referred to. You
21 said "when I left my first foster mother's
22 home."

23 A. Reena Neeley.

24 Q. Okay. When did you leave her home?

1 A. December 2016. December 2016.

2 Q. The same month that your daughter was
3 born?

4 A. Yes.

5 Q. How soon after the birth?

6 A. A couple weeks.

7 Q. And you moved into your own apartment?

8 A. My mother's home.

9 Q. And Malik came to live with you at your
10 mother's home then when you had your newborn
11 daughter?

12 A. Yes.

13 Q. How soon after your daughter was born?

14 A. About a month.

15 Q. So approximately January of 2017?

16 A. Yeah.

17 Q. And he stayed with you for how long?

18 A. Up until August 2017.

19 Q. So he lived with you continuously after
20 your first daughter was born but left before
21 Zion was born?

22 A. Yes.

23 Q. So with your first baby you lived with
24 your mother for how many months?

1 A. Me live with my mother for how many
2 months?

3 Q. You were living with your mother after
4 Afia was born?

5 A. Yes.

6 Q. How old was Afia when you moved out of
7 your mother's place?

8 A. About one years old.

9 Q. Did you move out of your mother's place
10 before or after Zion was born?

11 A. Before.

12 Q. So Malik left your mother's place, you
13 broke up with him, and you moved out after
14 you broke up with him?

15 A. Yes.

16 Q. And you moved to where?

17 A. Where I'm living, home.

18 Q. And you were living with her when your
19 son was born?

20 A. Before.

21 Q. Okay. And what about after he was born?

22 A. Not really, no.

23 Q. When did you leave Ms. Neeley's home
24 after the birth of your son or before?

1 A. I would say my son was a couple weeks
2 old, I believe.

3 Q. So you brought him home from the
4 hospital and shortly after that you left
5 Ms. Neeley's home?

6 A. Yes.

7 Q. To move where?

8 A. My mom.

9 Q. I take it each time you moved back in
10 with your mother you had permission from DHS
11 to do that?

12 A. Yes.

13 Q. And then after you lived with your
14 mother a while with your two children, you
15 got permission from DHS and the court to live
16 independently again?

17 A. Yeah.

18 Q. When did that happen?

19 A. I don't remember.

20 Q. Did the court at some point order you
21 back into supervised living?

22 A. No.

23 Q. After you lived independently?

24 A. What do you mean by that?

1 Q. The court allowed you to live
2 independently after you had your second
3 child; correct?

4 A. Yes.

5 Q. Did the court then order you back into a
6 group home after you were living
7 independently with your two children for a
8 while?

9 A. No.

10 Q. So you lived independently with your two
11 children and then you moved back to your
12 mother's home on your own choice?

13 A. Yes.

14 Q. And that's where you are now?

15 A. Yes.

16 Q. I apologize if I already asked you this.
17 Do you recall the name of any other foster
18 parent besides Ms. Neeley?

19 A. Yes.

20 Q. Who?

21 A. Shirley Brown.

22 Q. Where does she live?

23 A. Yeadon, Pa.

24 Q. On how many occasions did you live with

1 her?

2 A. Once.

3 Q. For how long?

4 A. Four months.

5 Q. How old were you?

6 A. 15.

7 Q. Did you have any problems with her?

8 A. Yes.

9 Q. What problems?

10 A. She was a very inconsiderate woman.

11 Q. How so?

12 A. She wasn't taking care of us properly.

13 Q. Sorry?

14 A. Well, me. She wasn't taking care of me
15 properly.

16 Q. In what way?

17 A. Clothes wise, hygiene wise, like simple
18 things.

19 Q. What else?

20 A. Allowance, school, school supplies.

21 Q. Clothes, hygiene, school, allowance,
22 school supplies?

23 A. Yes.

24 Q. Anything else?

1 A. No.

2 Q. What was the problem with clothing?

3 A. She would -- she would get paid to take
4 care of us and she would like instead of, you
5 know, getting us the things we need, she
6 would get other things, or she wouldn't get
7 us anything at all or something like really,
8 really cheap, like she would take us to like
9 Salvation Army, something like that.

10 Q. Take you where?

11 A. Salvation Army, something like that.

12 Q. You felt she wasn't spending enough of
13 the money on your clothing?

14 A. No.

15 Q. No, that's not how you felt?

16 A. No.

17 Q. So you felt she was spending enough
18 money on your clothing?

19 A. No. She would take me to the Salvation
20 Army for clothes and go to Macy's and by her
21 clothes. That's what I mean.

22 Q. What was the problem with hygiene?

23 A. We -- I would have to reach out to other
24 like family members and things like that to

1 get certain things that I needed.

2 Q. Such as?

3 A. Pads, soap, toothpaste, things like
4 that.

5 Q. What was the problem with school?

6 A. I didn't go to school.

7 Q. I thought you mentioned that one of the
8 problems you had with Ms. Brown was school.

9 A. She wouldn't give me transportation to
10 get to school.

11 Q. She didn't give you money to get on the
12 bus or subway, is that what you're saying?

13 A. Yes.

14 Q. And you said there was a problem with
15 the allowance. What was the problem there?

16 A. There wasn't enough.

17 Q. How much was it?

18 A. 10 dollars a week.

19 Q. How much should it have been?

20 A. I don't know, but it should have been
21 more than 10 dollars.

22 Q. What did you want it to be?

23 A. Enough for me to get around at least.

24 Q. How much would that have been?

1 A. I don't know.

2 Q. Well, was she short by a dollar or was
3 she short by 10 or 20 or 30 dollars?

4 MR. BEZAR: Objection to the
5 form.

6 MR. GREENBERG: I'm trying to --

7 MR. BEZAR: Don't answer. She's
8 already answered the question.

9 MR. GREENBERG: No, I don't think
10 so.

11 BY MR. GREENBERG:

12 Q. I'm trying to understand what your
13 problem with the allowance was. You said she
14 gave you 10 dollars a week?

15 A. Yes.

16 Q. How was that inadequate?

17 MR. BEZAR: She's already
18 answered that. You don't have to answer.

19 MR. GREENBERG: Are you
20 instructing her not to answer?

21 MR. BEZAR: I'm instructing her
22 not to answer.

23 MR. GREENBERG: Donna, would you
24 please note the record for that spot?

COURT REPORTER: Yes.

BY MR. GREENBERG:

Q. Okay. What was the problem with school supplies?

A. I wasn't getting the proper school supplies. I would go to school and they would ask me why don't I have a uniform, book bag, pencil, paper, folder, anything. So my --

Q. Where --

A. You can go.

Q. Where were you going to school?

A. Frankford High School.

Q. Did you have an attendance problem at Frankford High School --

A. Yes.

Q. -- that year? What was the attendance problem?

A. I didn't go.

Q. And the reason you didn't go was what?

A. Not much transportation and I didn't want to go.

Q. Not much transportation? What does that mean?

1 A. Not much transportation, money provided
2 for me to get there, because I was all the
3 way in Yeadon.

4 Q. And you didn't want to go?

5 A. No, I don't.

6 Q. Sorry?

7 A. I did not want to go.

8 Q. Why?

9 A. I was having a lot of issues and it was
10 this girl there, she would bother me a lot.
11 She would jump me.

12 Q. She jumped you?

13 A. Yes.

14 Q. In school?

15 A. No, outside of school, but she would
16 like bully me.

17 Q. Where? In Yeadon or where?

18 A. No, around my mom's home.

19 Q. How did that impact your desire to go to
20 school?

21 A. She would just pick on me. I wouldn't
22 want to be -- I wouldn't want to be in
23 school. Every time she seen me, she would
24 call out my name, she would follow me, she

1 would say mean things. I didn't want to go.

2 Q. And you said you had other issues?

3 A. Yes.

4 Q. That made you not want to go to school?

5 A. Yes.

6 Q. What were they?

7 A. I was having relationship issues with my
8 mother and I was smoking marijuana.

9 Q. How did the relationship issues with
10 your mother make you not want to go to
11 school?

12 A. The punishments.

13 Q. What were the punishments?

14 A. She made me not like school.

15 Q. How?

16 A. Every time I was in punishment, she
17 would make me do something that had something
18 to do with school, so I wouldn't want to go.

19 Q. I don't understand. What would she make
20 you that had something to do with school?
21 What would she make you do?

22 A. When I got a punishment for anything,
23 she would make me sit in a room like I was in
24 jail and make me write things out of the

1 dictionary or just like, just do, like just
2 copy out of the phone book or stuff, stuff
3 like that.

4 Q. That was in your mother's home?

5 A. Yes.

6 Q. You had to do that?

7 A. Yes.

8 Q. Why were you going there if you were
9 living in Yeadon in foster care?

10 A. That was -- that was before. That was
11 like one of the reasons why.

12 Q. What other issues made you not want to
13 go to school?

14 A. I was -- I think that's about it.

15 Q. Sorry?

16 A. That's about it.

17 Q. You said marijuana was a factor. How
18 did that make you not want to go to school?

19 A. I would just get lazy and not want to do
20 anything.

21 Q. You have filed a lawsuit alleging that
22 my clients and other defendants should be
23 liable to you for harm you suffered as a
24 victim of human trafficking.

1 Please tell us what happened to
2 you with regard to the human trafficking.
3 Start with, start at the beginning, how it
4 began, and take us right through what
5 happened with regard to the trafficking.

6 MR. BEZAR: You just want her to
7 kind of tell a story?

8 MR. GREENBERG: In her words,
9 yes.

10 MR. BEZAR: It's a broad
11 question. Tell a story?

12 MR. GREENBERG: Tell a story.

13 MR. BEZAR: Okay. Do you
14 understand the question?

15 THE WITNESS: Yes.

16 MR. BEZAR: Good.

17 THE WITNESS: I ran away from a
18 policeman and I had a family emergency, so I
19 ran away from a policeman.

20 BY MR. GREENBERG:

21 Q. I'm sorry?

22 A. I had a family emergency so I ran away
23 from a policeman. I was staying with a girl
24 named Sana McDaniel, which was an old foster

1 sister of mine.

2 Q. Can I hear her name again?

3 A. Sana McDaniel, S-A-N-A McDaniel.

4 Q. Family emergency caused you to leave
5 foster care?

6 A. It's not foster care, it's placement.

7 Q. Placement. What was the family
8 emergency?

9 A. My aunt tried to murder her children.

10 Q. Okay. Go ahead.

11 MR. BEZAR: Do you remember the
12 original question now is how you got involved
13 in trafficking.

14 THE WITNESS: Yes.

15 MR. BEZAR: Okay.

16 THE WITNESS: I was called -- I
17 was called to a motel and I was told it was a
18 party and it was no party. While I was there
19 my sister was having sex with a guy, and he,
20 I guess he made a decision to ask me if I was
21 interested. I said no.

22 BY MR. GREENBERG:

23 Q. I have to ask you to speak up because
24 I'm really having a hard time hearing you.

1 The court reporter has to take down what
2 you're saying and the people at the end of
3 the table have to. Don't be afraid to shout
4 at us. We won't be offended.

5 A. Okay.

6 Q. We just want to get what you're saying.
7 You said something about living with Sana
8 McDaniel who is somebody you lived with in
9 foster care?

10 A. Yeah, before. And I was living with her
11 at first, and things got out of hand, but one
12 day I was down Kensington and Allegheny and
13 Daiquan had called Sana McDaniel looking for
14 my sister Shareeka, and we went to Sana's
15 house, and I didn't know what was going on.

16 We went to Sana's house and he
17 started talking to me about, you know,
18 talking to guys. He didn't say anything
19 about sex at first. And I was interested
20 because I was living from home to home.

21 Q. You were what?

22 A. I was living from home to home. I was
23 interested in making money so I could talk to
24 older -- older guys for money. He didn't say

1 anything about sex.

2 Q. Oh, you were interested in the money?

3 A. Yes.

4 Q. Because you were living --

5 A. -- home to home. I didn't really have
6 anywhere to go, three weeks, something like
7 that.

8 Q. Okay.

9 A. So like I took interest, but he didn't
10 tell me that I had to have sex with anyone.
11 He told me that I would just like do
12 fetishes, like talk to old guys, so that's
13 how like it started.

14 Q. Okay. Then what happened?

15 A. He wanted to take pictures of me, and I
16 told him no, so he used pictures I guess of
17 someone else's body parts and made a fake
18 profile, a fake name, a fake age, ethnicity,
19 and stuff like that.

20 Q. Where did all this happen?

21 A. At Sana McDaniel's house -- home.

22 Q. And you mentioned a party, you thought
23 you were going to a party?

24 A. No, that was -- that was another -- that

1 was something else.

2 Q. All right.

3 A. But yeah, that's how it all started.

4 Q. It all started with you being at

5 Sana -- how do you say her name?

6 A. Sana McDaniel.

7 Q. -- Sana McDaniel's house?

8 A. Yes.

9 Q. Your sister was there? No, Daiquan
10 Davis was there and he was looking for your
11 sister?

12 A. Yes.

13 Q. And he started talking to you?

14 A. Yes.

15 Q. So where does the party or what you
16 thought was a party come into play?

17 A. That's part of where it began. That's
18 why I started there, but that night my sister
19 called me and she told me that she was having
20 a party at a hotel and she wanted me to come.

21 Q. Shareeka?

22 A. Yes. And I came and there was no party.
23 It was just her, Daiquan and Sana McDaniel.

24 And --

MR. BEZAR: Keep your voice up,

THE WITNESS: And while I was there, like he was -- he seemed like very upset, like something was wrong and then he like already knew me. I never met him before. He knew my name and everything. Like he was talking to me, where is your sister [REDACTED] you know.

BY MR. GREENBERG:

Q. He was what?

A. He -- he was talking to me like he met me already, like he knew my name and things like that, my nickname, and I was trying to figure out how did he know, so that's like kind of -- I guess that was the setup part of it.

Q. What nickname --

MR. BEZAR: I'm sorry. Before you ask a question, can we just go off the record?

VIDEO SPECIALIST: Going off the video record at 11:00 a.m.

(Discussion held off the record.)

1 VIDEO SPECIALIST: We're back on
2 the video record at 11:05.

3 BY MR. GREENBERG:

4 Q. Ms. [REDACTED] I'd like you to continue
5 explaining to us how you got involved in
6 trafficking and what happened after you got
7 involved.

8 So would you please go ahead?

9 A. You want me -- sorry. Do you want me to
10 start over?

11 Q. No, I don't think so. You explained to
12 us already that you had a family emergency
13 that caused you to leave your placement. I
14 think we know at the time that was at the
15 Villa?

16 A. Yes.

17 Q. And you were then with Ms. McDaniel who
18 you lived with in foster care, but you said
19 you didn't really have a home to live in at
20 the time. You told us that you were at
21 her -- her residence at or near Kensington
22 and Allegheny, and Daiquan Davis was there
23 and he talked to you about --

24 A. No, it wasn't Kensington and Allegheny.

1 That's where he met up with us at.

2 Q. Okay. So it was out on the street where
3 you met him?

4 A. No, I didn't meet him for the first time
5 in the street. I met him for the first time
6 in the hotel when my sister called me to
7 come.

8 Q. I see.

9 A. But he -- I believe it was the next two
10 days after I met him the first time, and I
11 was with Sana, Sana McDaniel at one of her
12 friend's houses, and he called and was
13 looking for Shareeka.

14 Apparently she stole money from
15 him and he was -- he asked where we were. He
16 was already down there and he asked where we
17 were and we met up with him and we went to
18 Sana's house down in Frankford.

19 Q. So before we move ahead, I'd like you to
20 back up and give us some more detail about
21 your first meeting with him at this hotel.

22 A. Okay.

23 Q. When and where did that happen and what
24 happened there?

1 MR. BEZAR: And try to keep your
2 voice up. Okay?

3 MR. GREENBERG: You dropped your
4 mic.

5 MR. BEZAR: Your mic came off.

6 THE WITNESS: It was October right
7 before I was 17.

8 BY MR. GREENBERG:

9 Q. You were 17 on October 10th?

10 A. Yes.

11 Q. Okay.

12 A. And I was walking, walking around one
13 day at night. My sister called me and she
14 told me there was a party somewhere on City
15 Line Avenue at a hotel and I went. I got a
16 ride there by another friend of mine at the
17 time, and when I got there, there was no
18 party. There was just my sister, Sana
19 McDaniel and Daiquan.

20 Q. What hotel was it?


21 A. I don't remember the name.

22 Q. It was a hotel on City Line Avenue?

23 A. Yes. I just know it was on City Line
24 Avenue.

1 Q. Okay. Go ahead. What happened at the
2 hotel?

3 A. When I arrived Sana came to get me from
4 the lobby and we went to the room. There was
5 no party. There was just them three.
6 Daiquan was sleeping when I first got there.
7 He woke up and he seemed like he was upset,
8 and he was like, Fu, where is your sister,
9 and I'm like, you know, he was talking to me
10 like he knew me already.

11 MR. BEZAR: Keep your voice up,
12  Come on.

13 THE WITNESS: He was talking to me
14 like he knew me already and I just told him
15 where my sister was and he went to go look
16 for her. So I sat on the bed for a while.
17 He came back.

18 I was asleep when he came back.
19 My sister woke me up and she was like, You
20 have to go in the bathroom, sleep in the
21 bathroom, so it turned into a little
22 argument.

23 And I went in the bathroom for a
24 while, went to go smoke. I heard moaning. I

1 opened the door and my sister was having sex
2 with this guy, and then the guy just, like he
3 stopped and he was like, I want your sister,
4 and all these things, and she was like, Well,
5 ask her. So I was like a little shocked by
6 it and I didn't do anything that night with
7 anybody.

8 We left the hotel. A few days
9 later I was with Sana McDaniel --

10 BY MR. GREENBERG:

11 Q. You left the hotel when?

12 A. The next morning.

13 Q. Okay.

14 A. We left. A few, two days later, a few
15 days later I was with Sana McDaniel down
16 Kensington and Allegheny. She received a
17 phone call from Daquan, him asking where
18 Shareeka was. I guess she stole money from
19 him.

20 He was already down there when he
21 called and he was like, he wanted to -- it
22 was something he was saying to her like he
23 wanted to go somewhere and talk about
24 something, so we went with him down to Sana's

1 house, and once we got there, that's when he
2 started to talk to me about like talking to
3 guys for money, doing little fetishes like
4 wearing stockings and things like that, and
5 that's how it all began, and he wanted to
6 take pictures of me and he kept trying to
7 like kind of force it, and I was like no. He
8 kept trying to take pictures of my breasts.
9 I said no.

10 He used other pictures of other
11 women's body parts and put it on the back
12 page ad and he made a fake name for me and
13 the age.

14 Q. What was the fake name?

15 A. Sincere.

16 Q. And what was the age?

17 A. 21.

18 Q. So when did that happen? That happened
19 a few days after you were in the City Line
20 hotel?

21 A. Yes.

22 Q. And all this happened out on the street
23 somewhere, or no, you said you went back to
24 somebody's house?

1 A. Yeah, Sana's house.

2 Q. Sana's house, which was where?

3 A. Frankford.

4 Q. Okay. So an ad was placed with your
5 fake name Sincere and your age?

6 A. Yeah.

7 Q. What was the age?

8 A. 21.

9 Q. And how did you know that that was done?

10 A. He told me.

11 Q. He told you he was doing it?

12 A. Yes.

13 Q. He said this is going to be your name?

14 A. Yes.

15 Q. And he used pictures of other people?

16 A. Yes.

17 Q. Other women?

18 A. Yes.

19 Q. Okay. What happened after the ad was
20 placed?

21 A. I met with a older guy and we just
22 talked, and then I got out of the car. He
23 gave me the money first. We talked. I
24 didn't do anything and I got out of the car

1 and I gave my half and I kept the other half.

2 Q. How much?

3 A. I don't remember.

4 Q. You don't have any idea?

5 A. No.

6 Q. What happened --

7 MR. BEZAR: You could ask her to
8 guesstimate. I know we don't do guesses
9 mostly, but you can answer.

10 BY MR. GREENBERG:

11 Q. That's what I'm looking for. If you can
12 estimate how much that was, you know.

13 A. I would say about a hundred dollars.

14 Q. That you split 50-50?

15 A. Yes.

16 Q. Okay. A hundred dollars for getting in
17 a car and talking to an older man?

18 A. Yes.

19 Q. Talking about what?

20 A. Anything he wanted to talk about.

21 Q. For how long?

22 A. I don't remember.

23 Q. Can you estimate?

24 A. About an hour.

1 Q. What happened after that?

2 A. I got out of the car. I went back in
3 the house and I gave Daiquan his half of the
4 money.

5 Q. Okay. Please continue.

6 A. I did two more after that. Sana left
7 before everything happened.

8 Q. Same day?

9 A. Yes. The next morning I walked to my
10 mother's house. She didn't live too far and
11 she didn't answer the door, so --

12 Q. She didn't do what?

13 A. I -- I walked to my mother's house the
14 next day. She wasn't there. Daiquan was
15 following me around. And I ended up going
16 with him to the Roosevelt.

17 Q. To the where?

18 A. The Roosevelt, the Roosevelt Inn.

19 Q. Another hotel?

20 A. Yes. That was the first hotel I ever
21 been to with him.

22 Q. How did you end up there?

23 A. We caught SEPTA.

24 Q. Well, you said you went to your mother's

1 house and she wasn't home?

2 A. Yeah. I was trying to like get away.

3 Q. And he was following you?

4 A. Yes.

5 Q. And who decided to go to the Roosevelt
6 Hotel?

7 A. Well, I didn't have anywhere else to go,
8 so I went with him.

9 Q. He said let's go to the Roosevelt Hotel?

10 A. Yes.

11 Q. And you went because you had nowhere
12 else to stay that night?

13 A. Yes.

14 Q. Okay. What happened after that?

15 A. Once we got there he like, he changed
16 into another person. He was yelling at -- he
17 was yelling at me and he was saying like you
18 need to wash up, you need to shave
19 everything, do your hair, and you're going to
20 be having sex with men.

21 Q. Can you put a date on this? You said
22 the first time you met him was before your
23 birthday.

24 A. Yes.

1 Q. And we know that's October 10.

2 A. Yes.

3 Q. So can you estimate the date when this
4 happened where he said you've got to clean up
5 and shave and you're going to have sex with
6 men?

7 A. I would say -- I would say the second
8 week of October.

9 Q. After your birthday?

10 A. Yes, I think so.

11 Q. How do you remember it was after your
12 birthday? Did you celebrate your birthday in
13 some way that year?

14 A. No, I didn't celebrate my birthday at
15 all, no.

16 Q. Okay. So we're in the second week of
17 October and now he's decided that you're
18 going to engage in prostitution, is that what
19 you're telling us?

20 A. Yes.

21 Q. Okay. What happened next?

22 A. I did what he said. He left the room
23 for a couple minutes, came back. He told me
24 that he set up an ad on Backpage and a guy

1 came and I had sex with him.

2 Q. At the Roosevelt Inn?

3 A. Yes.

4 Q. What happened after that?

5 A. We left. We stayed there one night. We
6 left and we went to Neshaminy.

7 Q. In the documents we have in this case --

8 A. Yes.

9 Q. -- I've seen the use of the term dates.

10 A. Yes.

11 Q. Doing dates?

12 A. Yes.

13 Q. Is that a term that you and Daiquan and
14 others have used for prostitution, doing
15 dates?

16 A. Yes.

17 Q. Having sex with a john?

18 A. Yes.

19 Q. That's doing a date?

20 A. Yes.

21 Q. Okay. So I'm going to use that
22 terminology. How many dates did you do at
23 the Roosevelt Inn before you left?

24 A. I would say about eight guys.

1 Q. That was your first day of prostitution?

2 A. Yes.

3 Q. Was that through a night?

4 A. Yes.

5 MR. BEZAR: Can we go off the
6 video?

7 VIDEO SPECIALIST: Going off the
8 video record at 11:16 a.m.

9 (Videotaping ceased.)

10 MR. BEZAR: I think we're talking
11 about October 2014. So just so we're clear
12 here, you can use whatever language you want
13 to use. "Dates" is the term I think that
14 we're using for the purposes of this
15 deposition, but I think that at that time
16 [REDACTED] was underage, under the age of 18,
17 and common nomenclature for that is actually
18 called rape.

19 I'm not going to continually
20 object to the form of the question. We'll go
21 with the term "date" as you've defined it,
22 but being an underage individual having sex
23 with older men is called rape, and so with
24 that understanding, I just want to put my

1 objection and I won't continue to interrupt
2 you. We can go back on.

3 (Videotaping resumed.)

4 VIDEO SPECIALIST: We're back on
5 the video record at 11:17.

6 BY MR. GREENBERG:

7 Q. When this activity with Daiquan and
8 these men began, you and he used the term
9 doing dates?

10 A. Yes.

11 Q. Okay. So you had sex with you're saying
12 you think it was eight men who paid for the
13 sex this first day?

14 A. Yes.

15 Q. At the Roosevelt Inn?

16 A. Yes.

17 Q. And where did the money go?

18 A. Half of it I kept and the other half he
19 kept.

20 Q. 50-50 split?

21 A. Yes.

22 Q. Were you doing this because you wanted
23 the money?

24 A. I needed the money, yes.

1 Q. You did want the money?

2 A. Yes.

3 Q. Okay. What happened after that?

4 A. After the first night?

5 Q. Yes.

6 A. We went to -- sorry -- the Neshaminy
7 Inn.

8 Q. Before we go further, had you ever had
9 sex with a man before this first night at
10 the --

11 MR. BEZAR: Roosevelt.

12 BY MR. GREENBERG:

13 Q. -- at the Roosevelt?

14 A. No.

15 Q. You were a virgin?

16 A. Oh.

17 Q. I don't mean sex for money.

18 A. Oh.

19 Q. Were you a virgin when you began having
20 sex at the Roosevelt?

21 A. No.

22 Q. How many times had you had sex before
23 that?

24 MR. BEZAR: Objection. She's not

1 going to answer that.

2 MR. GREENBERG: It goes to
3 damages.

4 MR. BEZAR: She's not going to
5 answer that.

6 MR. GREENBERG: Okay. Will you
7 note that, too?

8 MR. BEZAR: Yeah. You get a court
9 order, I'll bring her back.

10 MR. GREENBERG: Okay.

11 BY MR. GREENBERG:

12 Q. What happened after the Roosevelt Inn?
13 You said you went to the Neshaminy Inn?

14 A. Yes.

15 Q. What happened there?

16 A. He made me stand outside in front of the
17 lobby and he made me give him the money to
18 pay for the room.

19 Q. He made you do what?

20 A. Give me -- give him the money to pay for
21 the room.

22 Q. Out of the earnings that you had from
23 the night before at the Roosevelt?

24 A. Yes.

1 Q. And how much was that?
2 A. 65.
3 Q. For that room?
4 A. Yes.
5 Q. Where did that take place?
6 A. What do you mean by that?
7 Q. When he said to you, you have to pay up.
8 A. Oh, outside of the Neshaminy.
9 Q. Was it outdoors or indoors?
10 A. Outdoors.
11 Q. Okay. And then what happened after
12 that?
13 A. I gave him the money. He paid for the
14 room.
15 Q. Who went to the front desk to --
16 A. He did.
17 Q. Where did you go?
18 A. I stayed outside.
19 Q. Why?
20 A. He just told me I couldn't go in.
21 Q. He said what?
22 A. He told me that I couldn't go in.
23 Q. What happened after that?
24 A. I just stood outside. He paid for the

1 room and we went to the room.

2 Q. What happened next?

3 A. I went to the room and we set up an ad
4 for Backpage and did the same thing I did the
5 night before, had sex with men for money.

6 Q. How many dates did you do that night?

7 A. I don't remember.

8 MS. O'CONNELL: I'm sorry?

9 THE WITNESS: I don't remember.

10 BY MR. GREENBERG:

11 Q. Can you estimate?

12 A. Six.

13 Q. What happened after that?

14 A. We left the next morning and we went to
15 the Motel 6.

16 Q. Which Motel 6?

17 A. Near the airport.

18 Q. Why did you spend only one night at the
19 Neshaminy Inn?

20 A. I don't know.

21 Q. How did you get from the Neshaminy Inn
22 to the Motel 6?

23 A. Cab.

24 Q. Who paid?

1 A. Me.

2 Q. How was the money divided, if at all,
3 from the night at the Neshaminy Inn?

4 A. 50-50.

5 Q. Where were you keeping your money?

6 A. In my pocketbook.

7 Q. So you went to the Motel 6?

8 A. Yes.

9 Q. And what happened there?

10 A. Um, we went into the lobby and he made
11 me have a seat. He told me to have a seat.
12 He told me to have a seat and hand him the
13 money so he could pay for the room. And I
14 handed him the money, he paid for the room.

15 Q. Had you ever been to the Roosevelt
16 before this first time you just described
17 today?

18 A. No.

19 Q. Had you ever been to the Neshaminy
20 before that?

21 A. No.

22 Q. Had you ever been to the Motel 6 at the
23 airport before this?

24 A. No.

1 Q. Okay. So you sat in the lobby and he
2 rented a room?

3 A. Yes.

4 Q. Did you hear what was being said at the
5 front desk?

6 A. No.

7 Q. Do you know whether they asked him for
8 identification?

9 A. No.

10 Q. You didn't see or hear that?

11 A. I seen him pass the ID to the lady, but
12 I didn't hear her ask for it.

13 Q. You saw him show an ID?

14 A. Yes.

15 Q. What kind of an ID did he have?

16 A. State.

17 Q. Did he have a driver's license?

18 A. I don't know.

19 Q. So he showed an identification card of
20 some sort, you saw that?

21 A. Yes.

22 Q. And he paid the money for the room?

23 A. Yes.

24 Q. And it was a lady that checked him in

1 that day?

2 A. Yes.

3 Q. Can you give a description of her?

4 A. No.

5 Q. Not at all?

6 A. No. I know it was a woman. It was two
7 women.

8 Q. There were two women at the front desk
9 when you checked in?

10 A. There was two women.

11 Q. Were they Caucasian or African American?

12 A. One was black and one was white. That's
13 all I remember.

14 Q. Do you remember whether either of them
15 was tall or short or fat or skinny or
16 average?

17 A. One of them was kind of tall.

18 Q. The white or the black person?

19 A. Yes, the white woman.

20 Q. The white woman seemed tall?

21 A. Yes.

22 Q. Okay.

23 A. That's really all I can remember.

24 Q. Do you remember the height of the other

1 woman?

2 A. No.

3 Q. Do you remember either of them -- either
4 of them being on the heavy or light side?

5 A. No, they weren't heavy.

6 Q. They weren't heavy?

7 A. No.

8 Q. Were they thin?

9 A. Hmm, no.

10 Q. Do you remember how they were dressed?

11 A. They had on uniforms, but I don't
12 remember the color.

13 Q. When you say a uniform, what do you
14 mean?

15 A. Like a button down type of shirt with a
16 name tag.

17 Q. A name tag with their name or with the
18 motel name?

19 A. Their name.

20 Q. Were they wearing anything that said
21 "Motel 6"?

22 A. I don't remember.

23 MR. BEZAR: Can we pause? I
24 think we lost the microphone.

1 VIDEO SPECIALIST: Going off the
2 record at 11:25.

3 (Discussion held off the record.)

4 VIDEO SPECIALIST: Back on the
5 video record at 11:25.

6 BY MR. GREENBERG:

7 Q. Okay. So let's pick up where we left
8 off. You were explaining that you saw
9 Daiquan Davis check in at the Motel 6?

10 A. Yes.

11 Q. You saw the two women were at the front
12 desk?

13 A. Yes.

14 Q. He did show some identification?

15 A. Yes.

16 Q. And he paid for a room?

17 A. Yes.

18 Q. Did he ask for any particular room, to
19 be in any part of the property?

20 A. The first time -- the first time he did
21 ask for like a certain area, like could we be
22 somewhere more private I think. I believe
23 that's what he said, can we be somewhere more
24 private, and the lady gave him a room in like

1 the far back.

2 Q. Okay. After he got, after he paid did
3 he get a room key or two?

4 A. Yes, just one.

5 Q. How many?

6 A. Just one.

7 Q. And is that a card?

8 A. Yes.

9 Q. What happened next?

10 A. We went to the room.

11 Q. How did you get to the room?

12 A. Walked.

13 Q. You walked?

14 A. Yes.

15 Q. And where was it on the property?

16 A. What do you mean by that?

17 Q. Do you remember where on the property it
18 was, left, right, front, back, center?

19 A. To the left.

20 MR. BEZAR: You just used your
21 right hand, by the way, and you pointed to
22 the right.

23 THE WITNESS: Oh, sorry, to the
24 right. I'm sorry, to the right.

1 BY MR. GREENBERG:

2 Q. So when he came out of the room where
3 the front desk was, what turns did you have
4 to make to get to this room?

5 A. When you come out the lobby part it's
6 like these steps. It's like steps or a ramp
7 and you go down and you got to turn and
8 everything is to the right. All the rooms
9 and everything is to the right, because it's
10 the Red Roof Inn next to that one, so you got
11 to go right and it's just a bunch of rooms
12 that way.

13 Q. So you went to the room?

14 A. Yes.

15 Q. And what happened after that?

16 A. We set up dates on Backpage and I had
17 sex with men.

18 Q. How many dates did you do that night?
19 When I say that night, I really mean during
20 that stay, whether it was day or night. Do
21 you understand?

22 A. Like that first day there?

23 Q. You just described this first time you
24 checked into the Motel 6 with him. Well, he

1 checked in.

2 A. Yes.

3 Q. So during this stay, was this a one-day
4 stay or more?

5 A. One day.

6 Q. All right. During this one-day stay,
7 how many dates did you do?

8 A. Ten.

9 Q. About what time did you check in and
10 what time did you check out?

11 A. I don't -- it was daytime, so I would
12 say twelve, one o'clock in the afternoon.

13 Q. Somewhere around the middle of the day?

14 A. Yeah.

15 Q. Did you have lunch before you got there?

16 A. Yes.

17 Q. When did you next have a meal after you
18 checked into the Motel 6 with him?

19 A. After I had my second date when we got
20 there.

21 Q. How did you get food?

22 A. I ordered food from the pizza store.

23 Q. From your cell phone?

24 A. No, from the hotel phone, the phone we

1 had there.

2 Q. Okay. The phone in the room?

3 A. Yes.

4 Q. You ordered pizza in?

5 A. Yes.

6 Q. And it got delivered?

7 A. Yes.

8 Q. And then what happened after that? You
9 did more dates?

10 A. Yes.

11 Q. Then after you did those dates, what
12 happened after that?

13 A. The next morning --

14 Q. Did you go to sleep before the morning?

15 A. Yes.

16 Q. Okay.

17 A. The next morning, check out. We went to
18 the Quality Inn down in -- it was like down
19 the road from the Motel 6.

20 Q. It's also in the airport area?

21 A. Yes.

22 Q. And what happened at the Quality Inn?

23 A. He made me stand all the way in the back
24 of the hotel while he checked in.

1 Q. How did you get to the Quality Inn?

2 A. Walked.

3 Q. What time of day did you do that? Was
4 that -- again that was the middle of the day?

5 A. Yes.

6 Q. So you slept late in the morning, you
7 got up and you went to --

8 A. No.

9 Q. What did you do in the morning if you
10 didn't sleep late?

11 A. I got up, got ready to go, freshened up.

12 Q. Okay. And then you walked off the Motel
13 6 property to the Quality Inn property?

14 A. Yes.

15 Q. Did you walk along the road to get to
16 the Quality Inn or through other motel
17 property's parking lots?

18 A. No, on the street.

19 Q. You went back to the street and then to
20 the Quality Inn?

21 A. Yeah.

22 Q. How long a walk is that?

23 A. Fifteen minutes, ten minutes.

24 Q. So did you check into that hotel with

1 him around the middle of the day again?

2 A. No.

3 Q. What time of day was that?

4 A. It was around the same, the same time.

5 Q. Middle of the day?

6 A. Yeah, but I didn't check in with him.

7 Q. He checked in?

8 A. Yes.

9 Q. You stayed in the back of the hotel?

10 A. Yes.

11 Q. Why?

12 A. I don't know. He told me to stay. He
13 told me to stay back.

14 Q. And you didn't know why?

15 A. No.

16 Q. You had no idea?

17 A. No.

18 Q. What happened after he got a room there?

19 A. Um, we walked into the room. He set up
20 another Backpage ad and I did the same thing,
21 had sex with men for money.

22 Q. How many dates at that property?

23 A. Hmm, ten.

24 Q. Ten dates?

1 A. Yes.

2 Q. Did you have any meals while you were at
3 that property?

4 A. Yes.

5 Q. Did you go out to eat?

6 A. Yes.

7 Q. Where did you go?

8 A. McDonald's.

9 Q. Where was that in relation to the
10 Quality Inn?

11 A. It was like a five-minute walk.

12 Q. Did you do -- did you eat at McDonald's
13 before you did the dates or after or in
14 between some of them?

15 A. After.

16 Q. Then what did you do after having the
17 McDonald's?

18 A. I went back and continued to -- I went
19 back to the Quality Inn and I continued to
20 have sex with men for money.

21 Q. And he split the money with you?

22 A. Yes.

23 Q. He did that at the Motel 6 and at the
24 Quality Inn, you split the money?

1 A. Yes.

2 Q. 50-50?

3 A. Yes.

4 Q. Did you have any other meals before you
5 left the Quality Inn?

6 A. Yes.

7 Q. Where?

8 A. I ordered out.

9 Q. What did you order?

10 A. Chinese food.

11 Q. And it got delivered to the room?

12 A. Yes.

13 Q. What happened after that?

14 A. The rest of the night I had sex with men
15 for money and we left and we went to the
16 Neshaminy.

17 Q. You left the next morning?

18 A. Yes.

19 Q. About what time?

20 A. 11:00, 12:00.

21 Q. How did you get to Neshaminy?

22 A. SEPTA.

23 Q. When you say SEPTA, what do you mean?

24 A. Bus.

1 Q. Where did you catch the bus?

2 A. Across the street from the hotel.

3 Q. Where did that bus take you?

4 A. To Broad and Snyder, yeah.

5 Q. And then how did you get the rest of the
6 way to Neshaminy?

7 A. The train, the Broad Street Line all the
8 way to City Hall, get off at City Hall, go
9 all the way to Frankford, get off and get on
10 the 14 bus.

11 Q. The first what?

12 A. The 14 bus.

13 Q. And that goes all the way to the
14 Neshaminy Motor Inn?

15 A. Yes.

16 Q. What happened at the Neshaminy hotel?

17 A. He made me do the same thing, stand
18 outside while he went in and paid for the
19 room.

20 Q. How many dates did you do there?

21 A. I stayed that time two nights, so I
22 would say roughly 24.

23 Q. And did you have any meals while you
24 were there?

1 A. Yes.

2 Q. What meals did you have?

3 A. Pizza, um, pizza.

4 Q. You ordered in while you were there or
5 you went out?

6 VIDEO SPECIALIST: I'm sorry. I
7 need to go off the record for a second.
8 Going off the video record at 11:35.

9 (Discussion held off the record.)

10 VIDEO SPECIALIST: We're back on
11 the video record at 11:35.

12 BY MR. GREENBERG:

13 Q. So you're saying that the second time
14 you and Daiquan Davis went to the Neshaminy
15 Inn it was a two-night stay?

16 A. Yes.

17 Q. And you said you had some meals that
18 included ordering in pizza?

19 A. Yes.

20 Q. What else?

21 A. That's all I remember, ordering out from
22 the pizza store.

23 Q. You said you did about 25 dates during
24 this stay at the Neshaminy Inn?

1 A. Yes.

2 Q. Did you have any reason to leave the
3 room while you were there?

4 A. Yes.

5 Q. What reason?

6 A. I smoked marijuana so I would -- it was
7 a beer store on the other side of the
8 Neshaminy, and I would go there to get like a
9 wrap.

10 Q. A what?

11 A. A wrap. That's what people use to roll
12 their marijuana in.

13 Q. You mean rolling papers?

14 A. Yes.

15 Q. Okay, a wrap.

16 A. There is two different -- there is two
17 different things.

18 Q. To me a wrap is a sandwich.

19 A. Oh.

20 Q. A wrap is different from rolling papers?

21 A. Yes.

22 Q. How so?

23 A. It's tobacco and rolling papers is just
24 paper and a wrap is like tobacco.

1 Q. Are you talking about buying a cigar and
2 hollowing it out --

3 A. Um-hum.

4 Q. -- and putting the marijuana in, is that
5 what you're saying?

6 A. Yes.

7 Q. I've heard about that. Okay.

8 When you're at the Motel 6 --

9 A. Yes.

10 Q. -- a few days, a couple days before, did
11 you leave your room to smoke marijuana or did
12 you smoke in the room?

13 MR. BEZAR: Objection to the form.
14 I don't think she said she smoked. She might
15 have. Did you leave the room?

16 THE WITNESS: Yes, I left the room
17 to buy marijuana.

18 BY MR. GREENBERG:

19 Q. From who?

20 A. Somebody that was around.

21 Q. How did you find that person?

22 A. I walked to the Wawas.

23 Q. Was this set up by phone or something
24 like that, text or --

1 A. Yes. It was a guy that I knew that sold
2 marijuana and he met up with me at the Wawa
3 and I grabbed it from him and he left.

4 Q. Is that the only time you left the
5 room --

6 A. No.

7 Q. -- during that first stay at the Motel
8 6?

9 A. Oh, yes.

10 Q. All right. Let's just keep going then.

11 Okay. So you were at the
12 Neshaminy Inn for two nights and you had some
13 meals, pizza delivered in. What else?

14 A. Daiquan would leave, leave and go all
15 the time. That's what he normally did in the
16 motel, because he worked, so he wasn't there
17 24/7 while I was there. He would leave and
18 go, leave and go.

19 Q. He worked at Ruth Chris?

20 A. Yes.

21 Q. In Center City?

22 A. Yes.

23 Q. In the kitchen?

24 A. Yes. And, you know, so --

1 Q. So he would leave for eight or ten hours
2 at a time?

3 A. Yes.

4 Q. What were you doing during those
5 periods?

6 A. Having sex with men for money.

7 Q. You would keep the money in the room?

8 A. Yes.

9 Q. Until he came back and you divided it
10 up?

11 A. Yes.

12 Q. Could you have left at that point while
13 he was away at Ruth Chris?

14 A. No.

15 Q. Why?

16 A. I didn't have anywhere to go.

17 Q. You needed a place to sleep every night?

18 A. Yes.

19 Q. And you were making money to pay for
20 that?

21 A. Yes.

22 Q. Right? Okay.

23 So what happened after this? You
24 checked out of the Neshaminy Inn at some

1 point?

2 A. Yes.

3 Q. Was that morning or midday or evening?

4 A. I would say midday, like maybe two,
5 three o'clock.

6 Q. Where did you go? Do you recall?

7 A. Say that again.

8 Q. Do you remember where you went after you
9 left there?

10 A. Back to the Motel 6.

11 Q. At the airport?

12 A. Yes.

13 Q. And how did you get there?

14 A. Bus.

15 Q. What happened when you got to the Motel
16 6? Was Daiquan Davis with you?

17 A. Yes.

18 Q. Tell us about the check-in on that date.
19 Did you see it?

20 A. Did I see the check-in? I always seen
21 the check-in.

22 Q. Okay. How did that go?

23 A. Um, well, this particular time I believe
24 he left to go to work, so I was by myself

1 when I went.

2 I went to -- yeah, I believe he
3 left to go to work and I went to go do
4 something. I went to go shop or like, you
5 know, just treat myself out to something, and
6 around the time before he got off he told me
7 to make my way to the Motel 6, and I stayed
8 there for a while. I was sitting in the
9 lobby for a while and then he got there. I
10 gave him the money and they gave him a room.

11 Q. You said you went somewhere to treat
12 yourself to something. Where did you go and
13 what did you treat yourself to?

14 A. I went, I believe 69th Street, H & M.

15 Q. 69th Street Terminal area?

16 A. Yes.

17 Q. You went to a clothing store?

18 A. Yes.

19 Q. What did you buy?

20 A. Clothes for myself, shoes.

21 Q. And you used the money that you made
22 from sex?

23 A. Yes.

24 Q. And then you went to the Motel 6 at the

1 airport to meet him?

2 A. Yes.

3 Q. And you waited for him in the lobby?

4 A. Yes.

5 Q. What happened after that?

6 A. When he got there, I handed him the
7 money as usual and he paid for the room.

8 Q. How many dates did you do that night?

9 A. 12.

10 Q. Is that a guess or an estimate?

11 A. Yeah, like a estimate.

12 Q. Okay. Is it based on something?

13 A. No.

14 Q. Okay. Did you have any meals while you
15 were there?

16 A. Yes.

17 Q. What were the meals?

18 A. I walked to Wawas.

19 Q. How many times?

20 A. Once.

21 Q. How many days was this stay? How many
22 nights I should say?

23 A. Once.

24 Q. Where was your room on the Motel 6

1 property?

2 A. In the back.

3 Q. Was it in the back for some reason?

4 A. I believe so.

5 Q. What do you believe?

6 A. Well, being as though the things that I
7 were doing and it were -- it was cops riding
8 around. I guess they didn't want to draw too
9 many attention of men coming in and out, so I
10 was -- every time I was in Motel 6 I was in
11 the far back.

12 Q. You saw cops riding around?

13 A. Yes.

14 Q. When?

15 A. A few times.

16 Q. What did the police cars look like?

17 A. Regular like, like big trucks, like
18 the -- like a Jeep.

19 Q. SUV?

20 A. Yes.

21 Q. What city or town or municipality were
22 they from?

23 A. I don't know.

24 Q. Do you know whether they were state

1 police or local police or Philadelphia city
2 police?

3 A. No.

4 Q. Okay. How many times did you see police
5 driving through the property?

6 A. Two times. It wasn't -- I wouldn't see
7 them every time I was there, but a couple
8 times I would see them like riding around a
9 few hours.

10 Q. Well, so far we're up to your second
11 stay at the Motel 6; right?

12 A. Um-hum.

13 Q. Yes?

14 A. Yes.

15 Q. Are you talking about seeing police
16 during the first stay and the second stay or
17 just one of the two?

18 A. Both.

19 Q. When you saw the police, where were you?

20 A. In my room.

21 Q. You saw them through the window?

22 A. Yes.

23 Q. Were you ever outside when the police
24 drove by?

1 A. Yes.

2 Q. Where were you?

3 A. Walking to Wawas.

4 Q. Were you minding your own business?

5 A. Yes.

6 Q. How were you dressed?

7 A. I always had the same thing on. I had
8 this, this like mid-long black like shirt,
9 but it was like really long, like down I
10 would say to my ankle and it was like super
11 long slits right here (indicating) and I
12 would wear tights or jeans, and I had these
13 platform sneakers, I believe they were tan,
14 and I had -- I had a weave in. It was really
15 long. I had a marijuana scarf on my head. I
16 wear the same thing all the time.

17 Q. You what?

18 A. I wear the same thing most of the time.

19 Q. Was your body fully covered by this
20 outfit?

21 A. Yes.

22 Q. Okay. Would you say that it made you
23 look like a prostitute?

24 MR. BEZAR: Objection to the

1 form.

2 THE WITNESS: No.

3 BY MR. GREENBERG:

4 Q. You didn't pick that outfit to try to
5 look like a prostitute?

6 A. No.

7 Q. Okay. So you stayed at the Motel 6 for
8 one night and you did some dates and what
9 happened after that?

10 A. We left. He went to work and I was just
11 going down around the city doing whatever
12 until he got off.

13 Q. Doing whatever? What does that mean?

14 A. Um, eating, buying little things for
15 myself like toothpaste, toothbrush, hygiene,
16 underwear, thermals. You know, it was cold
17 out.

18 Q. What month is it now?

19 A. Right now?

20 Q. When you were walking around the city
21 buying these items.

22 A. November.

23 Q. What happened next? Did you meet up
24 with him again at some point?

1 A. Yes.

2 Q. Was that the next thing that happened?

3 A. Yes.

4 Q. Where?

5 A. Broad and Snyder.

6 Q. Okay. So that's in South Philadelphia?

7 A. Yes.

8 Q. Where did you go or what happened after
9 you met with him?

10 A. We would get on the bus and go to the
11 Motel 6.

12 Q. So you left the Motel 6, you checked
13 out, you walked around the city, and you went
14 back to the Motel 6?

15 A. Yes.

16 Q. Okay. And how long was that stay?

17 A. Two days. It was two days.

18 Q. And did he again show identification at
19 check-in?

20 A. Yes.

21 Q. He showed identification every time he
22 checked into the Motel 6?

23 A. Yeah.

24 Q. Okay. So you saw the check-in again?

1 You were in the lobby --

2 A. Yes.

3 Q. -- while he was checking in? And did
4 you see the people that were checking him in
5 or the person?

6 A. I wasn't paying attention.

7 Q. So you don't remember whether it was one
8 or two people?

9 A. No.

10 Q. What about at the second check-in? This
11 is the third Motel 6 check-in; right?

12 A. Um-hum.

13 Q. At the second Motel 6 check-in, do you
14 remember who was at the front desk to check
15 him in?

16 A. It was a woman.

17 Q. One person?

18 A. Yes.

19 Q. Do you remember whether she was black or
20 white?

21 A. No.

22 Q. You don't remember?

23 A. No.

24 Q. You don't remember anything about her

1 other than she was a woman?

2 A. No.

3 Q. Okay. So this third time you went to
4 the Motel 6 was a two-night stay?

5 A. Yes.

6 Q. And it immediately followed a one-night
7 stay?

8 A. What do you mean by --

9 Q. I think you told me you checked out of
10 the Motel 6, you walked around the city
11 buying some items. He was gone. You met up
12 with him at Broad and Snyder and you went
13 back to the Motel 6?

14 A. Yes.

15 Q. Do I have that right?

16 A. Yes.

17 Q. So these two nights immediately followed
18 a one-night stay?

19 A. Um-hum.

20 Q. Am I right?

21 A. Yes.

22 Q. Okay. So during --

23 MR. BEZAR: Keep your voice up,

24

THE WITNESS: Okay.

BY MR. GREENBERG:

Q. During this two-night stay, which is the third time you went to the Motel 6 --

A. Yes.

Q. -- did you do dates?

A. Yes.

Q. How many?

A. Eight.

Q. Eight over two days or eight per day for two days?

A. Oh, yeah, like about each day.

Q. About eight?

A. Yeah. So I would say 16, 17.

Q. Did you see any police?

A. Yes.

Q. Where were you?

A. I was in the car with one of my dates. We was on a car date.

Q. So one of the dates you did during this Motel 6 stay was in a car?

A. Yes.

Q. Where was the car during the date?

A. In the parking lot of Motel 6.

1 Q. Was it daylight or nighttime?

2 A. Daylight.

3 Q. And the police just drove by and didn't
4 stop?

5 A. Yes.

6 Q. Do you know if the policeman -- could
7 you see that the policeman saw you or not?

8 A. No.

9 Q. You couldn't tell if he saw you?

10 A. No.

11 Q. Or he didn't see you?

12 A. I couldn't tell.

13 Q. Was it a male or female police officer?

14 A. I don't remember.

15 Q. Did you have any meals during this
16 two-night stay at the Motel 6?

17 A. Yes.

18 Q. What were the meals?

19 A. Wawas.

20 Q. You walked to the Wawa for every meal?

21 A. No, not every meal.

22 Q. How many times did you go to the Wawa?

23 A. About four times.

24 Q. How long a walk is that?

1 A. Ten minutes.

2 Q. Did you go with him or alone?

3 A. Sometimes --

4 Q. With Mr. Davis?

5 A. Sometimes alone and sometimes with him.

6 Q. And did you have any meals in the room?

7 A. Yes.

8 Q. How many?

9 A. Three.

10 Q. Did you have any other meals during this
11 two-night stay at the Motel 6?

12 A. Yeah.

13 Q. What other meals did you have?

14 A. Ordering -- ordering out pizza.

15 Q. Okay. Any other meals?

16 A. I went to the vending machine that they
17 had there and got some snacks.

18 Q. How many times did you do that?

19 A. Twice.

20 Q. Did you leave the room at the Motel 6
21 during this third visit for two nights at any
22 other time besides going to the Wawa you said
23 and going to the vending machine?

24 A. Car dates.

1 Q. Did you leave the room for any other
2 reason?

3 A. To go to another motel.

4 Q. When you checked out?

5 A. Yes.

6 Q. How many car dates did you do while you
7 were at the Motel 6?

8 A. About six.

9 Q. Were these the first car dates you had
10 done?

11 A. Yes.

12 Q. What made the car dates start, if you
13 know? Was there a new ad or something else?

14 A. No. That's what the guy wanted.

15 Q. And six of them wanted that that night?

16 A. Yes.

17 Q. And this was the first time you did any
18 car dates?

19 A. Yes.

20 Q. Were you about to add something? I
21 didn't mean to cut you off.

22 A. Yeah. They all didn't happen in one
23 night, the car dates. They happened
24 different -- at different times, different,

1 like different stays that I was there. They
2 didn't all happen that one night.

3 Q. The car dates only happened at the Motel
4 6?

5 A. Yes.

6 Q. So during these first three stays at the
7 Motel 6 you had six car dates?

8 A. Yes.

9 Q. And you remember them well enough to be
10 able to count them?

11 MR. BEZAR: Objection to the
12 form. I think she -- I think we said she was
13 estimating; right?

14 THE WITNESS: Yes.

15 MR. GREENBERG: You said it.

16 MR. BEZAR: We said it from the
17 beginning. I'm not going -- we said it from
18 the beginning. She didn't know the exact --
19 hold on. She didn't know the exact number
20 and she's doing her best to give you
21 estimates or guesstimates. You asked for it
22 and we thought that made sense.

23 BY MR. GREENBERG:

24 Q. What happened after the Motel 6? You

1 said you left the Motel 6?

2 A. Um-hum, and we went to the Neshaminy
3 Inn.

4 Q. How did you get there?

5 A. Bus.

6 Q. With Mr. Davis?

7 A. Yes.

8 Q. Were you present for the check-in?

9 A. Yes.

10 Q. What can you tell us about the check-in?

11 A. Well, I never went in. I was just
12 standing outside in the parking lot, but I
13 could see in the window. There is like a
14 glass window you can look in.

15 Q. How many nights did you stay at the
16 Neshaminy Inn?

17 A. One.

18 Q. How many dates did you do?

19 A. 13.

20 Q. And when did you --

21 MS. O'CONNELL: I'm sorry?

22 THE WITNESS: 13.

23 BY MR. GREENBERG:

24 Q. When did you leave the Neshaminy Inn?

1 The next morning?

2 A. Yes.

3 Q. Did you have any meals while you were in
4 the Neshaminy Inn?

5 A. Yes.

6 Q. How many?

7 A. Two.

8 Q. What were the meals? Were they in or
9 out?

10 A. One of them was out.

11 Q. Where?

12 A. I walked to a gas station.

13 Q. And the other you ordered in?

14 A. Yes.

15 Q. Where did you go after the Neshaminy
16 Inn, the one night at the Neshaminy Inn?

17 A. Comfort -- I meant, sorry, not the
18 Comfort, Motel 6.

19 Q. And how many nights did you stay there?

20 A. One.

21 Q. This is your fourth time at the Motel 6?

22 A. Um-hum.

23 Q. Yes?

24 A. Yes.

1 Q. Mr. Davis checked in?

2 A. Correction. Sorry. That time we stayed
3 I believe three days, two days, three days.

4 Q. Okay. You saw him check in?

5 A. Yes. I was with him.

6 Q. He showed identification?

7 A. Yes.

8 Q. Do you remember who was at the front
9 desk?

10 A. A woman. That's all I remember.

11 Q. Did you have any reason to leave the
12 room during this three-day stay?

13 A. Yes.

14 Q. Where was your room during this stay?

15 A. In the back.

16 Q. Was it always the same exact room?

17 A. No. It was just always in the back.

18 Q. So you stayed for three days and where
19 did you go after that?

20 A. The Quality Inn.

21 Q. Where was the Quality Inn?

22 A. Down the road from the Motel 6.

23 Q. How many days did you stay there?

24 A. One.

1 Q. And where did you go after that?

2 A. I went shopping.

3 Q. Did you stay in another hotel after
4 that?

5 A. Motel 6.

6 Q. For how many nights?

7 A. One.

8 Q. Where is the next place you stayed after
9 that?

10 A. Motel 6.

11 Q. Which Motel 6?

12 A. The same one, the airport Motel 6.

13 Q. So you checked out and then you checked
14 back in?

15 A. Yes.

16 Q. For how many nights?

17 A. One.

18 Q. Where did you go after that?

19 A. Shopping, eat.

20 Q. Where did you stay after that?

21 A. Motel 6.

22 Q. For how many nights?

23 A. One.

24 Q. And where did you go after that?

1 A. Go see some friends.

2 Q. And where did you stay after that?

3 A. Motel 6.

4 Q. For how many nights?

5 A. One.

6 Q. So how long did that go on that you kept
7 going back to the Motel 6?

8 A. A couple weeks.

9 Q. With him checking in each time showing
10 identification?

11 A. Yeah.

12 Q. And then what happened after the couple
13 of weeks at the Motel 6?

14 A. We went to the Comfort Inn.

15 Q. And is that when you got arrested?

16 A. Yes.

17 Q. Okay.

18 MR. GREENBERG: This is a good
19 stopping point. We're out of tape. It's
20 about noon, so we're going to take a break.

21 VIDEO SPECIALIST: Going off the
22 video record at 11:57. This is the end of
23 tape one.

24 (At 11:57 a.m. a luncheon recess

1 was taken.)

2 - - -

3 (The deposition resumed at 12:46
4 p.m.)

5 (Mr. Morgenstern is not present in
6 the deposition room.)

7 VIDEO SPECIALIST: We're back on
8 the video record at 12:46. This is the start
9 of tape two.

10 BY MR. GREENBERG:

11 Q. Ms. [REDACTED] before we took a break for
12 lunch you described several stays at the
13 Motel 6.

14 A. Um-hum.

15 Q. I want to finish that subject and then
16 move on to something else. I'm going to
17 remind you to please try to keep your voice
18 up so we can hear you. Okay?

19 A. Okay.

20 Q. You explained in some detail your
21 recollection of stays at Motel 6, Roosevelt
22 Inn, Neshaminy Inn, I think you said Quality
23 Inn.

24 A. Yes.

1 Q. And then the Comfort Inn.

2 A. Yes.

3 Q. And when speaking about the Motel 6, I
4 think you described four stays, some of which
5 were more than one night, and then you said
6 that you stayed there on consecutive nights
7 for about two weeks?

8 A. Um-hum.

9 Q. Are you with me?

10 A. Yes.

11 Q. Is that your recollection so far?

12 A. Yes.

13 MR. BEZAR: Objection to the
14 form. Go ahead.

15 BY MR. GREENBERG:

16 Q. You don't know the dates of these stays,
17 am I right?

18 A. No.

19 Q. I'm not right?

20 A. Oh, yes, you were.

21 Q. You don't know the dates; correct?

22 A. No, I don't know the dates.

23 Q. But they happened in October?

24 A. And November.

1 Q. And November?

2 A. Yeah.

3 Q. Of 2014?

4 A. Yes.

5 Q. They happened before you got arrested at
6 the Comfort Inn in Trevose?

7 A. Yes.

8 Q. Do you know the date of the arrest?

9 A. November 7th.

10 Q. 2014?

11 A. Yes.

12 Q. How long had you been at the Comfort Inn
13 when you got arrested?

14 A. A few hours.

15 Q. It was your first stay there?

16 A. Yes.

17 Q. And did it happen, did the arrest happen
18 in the daytime or nighttime?

19 A. Nighttime.

20 Q. Do you know about what time?

21 A. 7:00, eight o'clock p.m.

22 Q. Okay. When Mr. Davis checked into these
23 different motels --

24 A. Yes.

1 Q. -- did he prepay? In other words, did
2 he pay at the time of check-in?

3 A. Yes.

4 Q. How did he pay?

5 A. Cash.

6 Q. Always?

7 A. Yes.

8 Q. At all the motels?

9 A. Yes.

10 Q. Did he have a credit card?

11 A. No.

12 Q. So the only way he could pay was cash?

13 A. Yes.

14 Q. I take it you didn't have a credit card
15 either?

16 A. No.

17 Q. No, you didn't?

18 A. No.

19 Q. I'm not trying to badger you. Just for
20 the record, when we get no, it could mean
21 it's not right or it could mean something
22 else, so I just want to be clear.

23 Is it true that you did not have
24 your own credit card?

1 A. Yes.

2 Q. So cash was the only way that you and
3 Mr. Davis could pay for these rooms at all
4 the various hotels?

5 A. Yes.

6 MR. BEZAR: Objection to form.

7 BY MR. GREENBERG:

8 Q. Was there any other way you could pay?
9 Did you have any other form of payment?

10 A. No.

11 Q. Checks?

12 A. No.

13 Q. Neither of you had any checks?

14 A. No.

15 Q. I take it everything you bought, all
16 your meals, any clothing articles, any
17 hygiene articles, toiletry articles, all of
18 it was paid for in cash?

19 A. Yes.

20 Q. Same for him, whatever he bought he paid
21 for in cash as far as you know?

22 A. Yes.

23 Q. So every room was paid for at the time
24 of check-in. Would that be for the first

1 night or for any number of nights you were
2 going to stay?

3 A. The number of nights, what do you mean,
4 like at a time?

5 Q. I'll explain. You've told us that some
6 of the stays at these hotels were for more
7 than one night.

8 A. Um-hum.

9 Q. Right?

10 A. Yes.

11 Q. So let's say, let's talk about one of
12 them that was two nights. There were several
13 that were two nights, weren't there?

14 A. Yes.

15 Q. When you were going to stay at a
16 property, at a motel for two nights, did he
17 prepay, Mr. Davis, did he prepay for two
18 nights at the time of check-in?

19 A. Sometimes.

20 Q. And other times what did he do?

21 A. I would have to work the rest of it off
22 to pay for the next day.

23 Q. Who would go back to the front desk to
24 extend the stay with another payment? Him?

1 A. Both of -- both of us.

2 Q. Why did you both go?

3 A. Well, we were always like getting off
4 the bus and going like in, so --

5 Q. Well, if you were staying at a property
6 for two days in a row, why would you be
7 getting off of a bus?

8 A. Because we would leave and go somewhere.
9 I told you when we would stay those two
10 consecutive nights, he would go to work and I
11 would go do something. We would meet up, go
12 back in, go in the lobby, and I would give
13 him the money for the second night.

14 Q. When you checked out of these motels,
15 did you leave the keys in the room? Did you
16 take the keys with you? Did you return the
17 keys to the office? What was the way you
18 checked out?

19 MR. BEZAR: Checked out or what
20 she did with the keys? They're two different
21 things; right?

22 MR. GREENBERG: I don't think so.

23 MR. BEZAR: Well, I'm asking you
24 to clarify, please.

1 BY MR. GREENBERG:

2 Q. When you were done staying at these
3 properties, what did you do with the keys?

4 A. I just remember a few times leaving it
5 and a couple times returning it to the front
6 desk.

7 Q. Did you ever just throw them away?

8 A. No.

9 Q. You would leave them in the room?

10 A. Yes.

11 Q. Were they always cards?

12 A. Yes.

13 Q. Like a plastic card, looks like a credit
14 card?

15 A. Yes.

16 Q. So you either left it in the room or you
17 took it back to the front desk?

18 A. Yes.

19 Q. And when it was, when the key was
20 returned to the front desk, who did that, him
21 or you or both of you?

22 A. Both. We just --

23 Q. You would do it together?

24 A. Yes.

1 Q. Always?

2 A. No.

3 Q. So both of you did it sometimes?

4 A. Yes.

5 Q. What about the other times?

6 A. Like depending on how we were traveling,
7 where we were going, so if we were waiting
8 for a cab and it was already there or
9 something, then I would like hold up the cab
10 and he would like run in and return the key,
11 so it depends on, or if we were catching
12 SEPTA, we would just go there together and
13 drop the keys off and then go catch the bus.

14 Q. While you were staying in these motels
15 and hotels, did you or he ever put the do not
16 disturb sign on the room door to keep
17 housekeeping out of the room?

18 A. Yes.

19 MR. BEZAR: Objection.

20 THE WITNESS: Yes.

21 BY MR. GREENBERG:

22 Q. Was that done routinely? Was that the
23 usual practice, to put the do not disturb
24 sign on the outside of the room door?

1 A. Yeah.

2 Q. So if you stayed in a room for more than
3 one night, you were there for two nights or
4 three nights, would you keep the housekeeping
5 people out of the room or would you let them
6 in to clean it up?

7 A. I would let them in to clean it up.

8 Q. So you would take the do not disturb
9 sign away so they could clean up?

10 A. They would only come clean up when we
11 were checking out.

12 Q. Okay. So we're up to the Comfort Inn on
13 November 7th. About what time did you get to
14 the Comfort Inn?

15 A. I would say early afternoon, 12:00,
16 1:00, 12:00, one o'clock.

17 Q. How did you get there?

18 A. The bus.

19 Q. From where?

20 A. Motel 6.

21 Q. One bus all the way there?

22 A. Um-um.

23 Q. No?

24 A. We caught a cab to Snyder, Broad Street

1 Line, City Hall, Frankford, 14 bus, got off
2 at Neshaminy, walked to the Comfort Inn.

3 Q. How long did that take?

4 A. At least an hour.

5 Q. Maybe more?

6 A. No.

7 Q. Not more than an hour?

8 A. No, I don't think so.

9 Q. So you got to the Comfort Inn at what
10 time?

11 A. Like 1:00, two o'clock.

12 Q. Tell me about the check-in at the
13 Comfort Inn.

14 A. Um, I had to stand on the, near the fire
15 escape door while he paid for the room. Then
16 I went in the fire escape to the second floor
17 to the room.

18 Q. Why did you have to do that whereas you
19 didn't have to do that at the Motel 6?

20 A. I don't know. He never explained it.

21 Q. So he checked in without you being
22 present?

23 A. Yes.

24 Q. You didn't see who checked him in or

1 what happened during the check-in?

2 A. No.

3 Q. So then he came and got you with a room
4 key?

5 A. Yes.

6 Q. And what happened next?

7 A. We went to the second floor. We went in
8 the room and we set up a Backpage ad.

9 Q. So there was a new Backpage ad posted
10 for each new location and new date?

11 A. No. The way the Backpage works is it's
12 like a -- like a time thing, so you got to
13 pay for the ad to stay up on that page, so
14 that's how it works. So every day he got to
15 pay 25, I believe it was 25 dollars on a
16 prepaid card and transfer it to the account
17 so your ad could stay up.

18 Q. And how long does your ad stay up?

19 A. 24 hours.

20 Q. So you got to the Comfort Inn. You went
21 to the room?

22 A. Yes.

23 Q. The Backpage ad was set up again?

24 A. Yes.

1 Q. Who did it?

2 A. Daiquan.

3 Q. And then what happened after that?

4 A. I had a few dates and the last one was a
5 police officer and I was arrested.

6 Q. When you say "a few dates," what does "a
7 few" mean?

8 A. Four. I recall four.

9 Q. About four?

10 A. Yes.

11 Q. Before the police officer?

12 A. Yes.

13 Q. So the police officer would have been
14 the fifth date if he wasn't a police officer?

15 A. Fourth or fifth, yeah.

16 Q. Okay. So what happened with that date?
17 How did that one go?

18 A. Um, so like usual, every time a customer
19 calls or texts, you ask them what they want,
20 how long. You tell them the price. They
21 agree to it or not and you tell them your
22 rules. You give them the address to the
23 place. You don't give them the room number
24 first.

1 Q. Why?

2 A. It's like a safety concern. So you
3 don't just, like you can't just give them the
4 address to the hotel and then the room number
5 because you don't know if they -- the way
6 that he had said, you don't know if it's a
7 cop or not, so don't give them the room
8 number until they say they're here.

9 So once they say they're there,
10 you give them the room number, and then you
11 tell them to knock on the door or whatever
12 you tell them to do to the door, and then
13 once you hear it you let them in and they pay
14 you and you do what they ask for.

15 Q. You say that when they called you gave
16 them the rules?

17 A. Um-hum.

18 Q. What were the rules?

19 A. No anal and no oral sex. I didn't do
20 that.

21 Q. Any other rules?

22 A. Yeah, that's about it.

23 Q. So you got this call, and you didn't
24 give your room number, but you said you were

1 at the Comfort Inn?

2 A. Yes.

3 Q. And what happened after that?

4 A. He said he was there. I gave him the
5 room number. Daiquan left to go, it was a
6 gas station right next to the hotel, so he
7 went to go get more wraps because we were
8 smoking, and when he left the police officer
9 knocked on the door. I thought it was a
10 date. The first time I knocked, I didn't see
11 anybody there, closed the door. Somebody
12 knocked again. Thought it was Daiquan. I
13 opened the door. It was the guy. He walked
14 in. He felt up on me, gave me the cash,
15 pulled out the badge, and said I'm under
16 arrest.

17 Q. What do you mean he felt up on you?

18 A. Like he felt my body up, like he was
19 feeling on my breasts and --

20 Q. In a sexual way?

21 A. Yes.

22 Q. You're not describing a frisk, you're
23 describing an improper touching?

24 MR. BEZAR: Objection to form.

1 BY MR. GREENBERG:

2 Q. You're not describing somebody searching
3 you for weapons, you're describing somebody
4 who is touching your private parts?

5 A. Yes.

6 Q. What did the police officer look like?

7 A. He was tall Caucasian, blue eyes. I
8 believe his hair was like a dark blonde. He
9 had on Levy jeans, dark, really like vintage,
10 a button down, some it looked like
11 construction sneakers I remember.

12 And when he came in I was, you
13 know, introduced myself and he introduced his
14 self and then he felt up on me, and then he
15 handed me the money, and I walked to the
16 other side of the room to get undressed, and
17 he pulled out the badge.

18 Q. What were you wearing when you answered
19 the door?

20 A. Panties and bra.

21 Q. So you went to the other side of the
22 room to get undressed and what did he do?

23 A. Pulled out a badge, his badge, and told
24 me that, you know, told me my Miranda rights.

1 Q. He said he was a cop?

2 A. Yes.

3 Q. And what happened after that?

4 A. I gave him my hand so he can put me in
5 handcuffs. And he asked me my name and my
6 age, and the other policeman walked in with
7 Daiquan in handcuffs, and it seemed like they
8 already knew him and --

9 Q. Why?

10 A. Because they said his name. They said,
11 Oh, it's you, and he was like really upset,
12 and they took me to the station. They asked
13 me questions and --

14 Q. Backing up a little bit, the police
15 officer showed you his badge, said he was a
16 cop?

17 A. Um-hum.

18 Q. You said he asked you your name and your
19 age?

20 A. Yes.

21 Q. Did you give him your name and your age?

22 A. No. At first I gave him a fake name and
23 fake age, but then he told me that I would
24 be, get in trouble if I give false

1 information, so I gave him my real name and
2 my real age.

3 Q. When he first asked for your age you
4 said your name was Desiree Johnson?

5 A. Yes.

6 Q. Why did you lie to him about your age?

7 A. Because I was afraid.

8 Q. What were you afraid of?

9 A. Going to jail.

10 Q. You thought that might keep you out of
11 jail?

12 A. Yeah.

13 Q. When he asked you your age, what did you
14 tell him?

15 A. 18. I believe 18.

16 Q. How old were you then?

17 A. 17.

18 Q. So why did you lie about your age?

19 A. I was afraid. Maybe I thought if I was
20 considered an adult I would be like let off.
21 I don't know. I was just scared.

22 Q. So then you told him your correct name
23 and age because he told you you needed to
24 tell the truth?

1 A. Yes.

2 Q. Yes?

3 A. Yes.

4 Q. Didn't he actually find two pill bottles
5 in your pocketbook that had your name --

6 A. Yes.

7 Q. -- after you told him your fake name?

8 A. Yes.

9 Q. That's how it happened; right?

10 MR. BEZAR: Objection to the
11 form.

12 BY MR. GREENBERG:

13 Q. Is that how it happened?

14 MR. BEZAR: Is that how what
15 happened?

16 THE WITNESS: No.

17 MR. BEZAR: Hold on, hold on. Is
18 that what?

19 BY MR. GREENBERG:

20 Q. He showed you the pill bottles that had
21 the name [REDACTED] and that's when you
22 admitted that that was your name?

23 A. No.

24 Q. That's not what happened?

1 A. No.

2 Q. So if he says that's what happened, he's
3 lying?

4 MR. BEZAR: Objection. She's not
5 going to answer that. You can ask him that
6 if you want.

7 MR. GREENBERG: That's a proper
8 question.

9 MR. BEZAR: She's not going to
10 answer.

11 MR. GREENBERG: You're starting
12 to become obstructionist.

13 MR. BEZAR: I'm starting?

14 MR. GREENBERG: It's a proper
15 question.

16 MR. BEZAR: Well, she's not going
17 to answer. You can note it --

18 MR. GREENBERG: Would you mark
19 that, please?

20 MR. BEZAR: -- on the transcript
21 and you can do whatever you like. Ed, I just
22 want -- no, no, no.

23 MR. GREENBERG: We don't have to
24 argue it.

1 MR. BEZAR: I'm not arguing.

2 MR. GREENBERG: You made your
3 objection.

4 MR. BEZAR: I'm trying to get
5 along. I'm not starting to become
6 obstructionist. We've been here for a few
7 hours. I've interfered a couple of times,
8 that's it, okay. Just we're here to get
9 through this; right?

10 MR. GREENBERG: So am I, but it's
11 the third improper objection. And this
12 one -- well, I'm not going to argue with you.
13 I'm going to move on. We'll deal with it
14 later. We both know how to deal with these
15 things, so --

16 MR. BEZAR: Do you? Do you know
17 how to deal with them?

18 MR. GREENBERG: So --

19 MR. BEZAR: How do you deal with
20 them? No, how do you deal with them?

21 MR. GREENBERG: I'm not going to
22 argue this. I don't want to waste the time.

23 MR. BEZAR: We're going to take a
24 break.

1 MR. GREENBERG: That's for the
2 court.

3 MR. BEZAR: No, we're going to
4 take a break. That's for me.

5 MR. GREENBERG: Take a break.

6 VIDEO SPECIALIST: Off the video
7 record at 1:04.

8 (Recess; 1:04 p.m.)

9 - - -

10 (Resumed; 1:07 p.m.)

11 (Exhibit EB-1 was marked for
12 identification.)

13 VIDEO SPECIALIST: We're back on
14 the video record at 1:07.

15 BY MR. GREENBERG:

16 Q. Miss [REDACTED] I'm handing you a document
17 that's been marked EB-1. I have a copy for
18 your attorney. Everyone else has been given
19 a copy.

20 This is the -- this is the
21 Bensalem Township Police Incident Report that
22 begins with November 7th, 2014, and it
23 includes other dates. It's been marked on
24 the lower right-hand corner BTPD1 on the

1 first page. Do you see that, lower
2 right-hand corner?

3 A. Um-hum.

4 Q. And then the last page is BTPD61. Do
5 you see that?

6 A. Um-hum.

7 Q. Yes?

8 A. Yes.

9 Q. Again, I'm going to ask you to try to
10 keep your voice up so we can all hear you.

11 I'd like you to turn to the
12 seventh page. It says BTPD7 and near the
13 bottom there is a paragraph that says, "I
14 noticed that the female appeared to be
15 young."

16 Do you see that?

17 MR. BEZAR: Just read the part
18 that he's asking you to read, and he's asking
19 you, do you see that?

20 THE WITNESS: Yes.

21 BY MR. GREENBERG:

22 Q. I'm actually going to read it to you.
23 You can follow along with me and I'm going to
24 go slow so I make sure that you have heard it

1 and understood it. Okay?

2 A. Yes.

3 Q. It's up on the screen if you want to
4 look at it up there.

5 MR. BEZAR: Or it's here, too.

6 BY MR. GREENBERG:

7 Q. It says, "I noticed that the female
8 appeared to be young. I asked her how old
9 she was and she said 18. She told Officer
10 Crozier that her name was Desire or Desiree
11 Johnson 10/10/96. Officer Crozier noticed
12 that she had two pill bottles in her purse.
13 I looked at them and they had the name [REDACTED]
14 [REDACTED] on the label. I confronted her about
15 not telling the truth. At that time she said
16 that was her real name and she was 17 years
17 old. She said that she was reported missing
18 out of Philadelphia by DHS."

19 Now, the first question is, did I
20 read that correctly? Were you able to follow
21 it?

22 A. Yes.

23 Q. Isn't that what happened at the time of
24 the arrest?

1 A. No.

2 Q. You were confronted with the pill
3 bottles?

4 A. No.

5 Q. So you're saying this is incorrect?

6 A. I was confronted with the pill bottles,
7 but that was after the fact I told him my
8 name. He was making sure that I was being
9 honest.

10 Q. Okay. You can lay that aside for now.

11 MR. GREENBERG: You can take that
12 down.

13 MR. BEZAR: How young did you
14 look? Much younger than you look now?

15 THE WITNESS: Yes.

16 MR. GREENBERG: Counsel, I would
17 ask for you to wait your turn to ask
18 questions.

19 MR. BEZAR: I'm sorry, I didn't
20 realize, is there a rule that says we have to
21 do turns? Is there a rule?

22 MR. GREENBERG: I think that's
23 the custom.

24 MR. BEZAR: Oh, okay. I thought

1 there was a rule.

2 MR. GREENBERG: Isn't that what
3 you want me to do when you're taking a
4 deposition?

5 MR. BEZAR: I'm not sure what --

6 MR. GREENBERG: Wait until you're
7 done before I ask --

8 MR. BEZAR: I'm not sure what you
9 do. Just while you were on this page, "I
10 noticed that you appeared young." Did you
11 look young at the time?

12 THE WITNESS: Yes.

13 MR. GREENBERG: Objection.

14 MR. BEZAR: Okay. We can go on.

15 Can we put that back up on the
16 screen, sir?

17 VIDEO SPECIALIST: If Ed tells me
18 to.

19 MR. GREENBERG: You'll be able to
20 have it back. You'll be able to have any of
21 it when it's your turn to question. Right
22 now I'm going to go ahead with my questioning
23 if you don't mind.

24 MR. BEZAR: So you're not going

1 to let him --

2 MR. GREENBERG: You have the
3 document there.

4 MR. BEZAR: We're not going to put
5 it back on the screen? You're not going to
6 let him put it back on the screen?

7 MR. GREENBERG: When I need it, I
8 will ask him to, and when you need it you can
9 ask him to, but you're going to have to wait
10 your turn.

11 MR. BEZAR: But I'm -- we're here
12 right now. I won't have many questions at
13 the end, so we have this document. Can I put
14 it back up? Unless you don't want him to and
15 then he won't do it and that's fine.

16 MR. GREENBERG: Put it back up
17 for him.

18 MR. BEZAR: Thank you.

19 The part that Mr. Greenberg read,
20 can you just go back to it?

21 Do you see the notation there, and
22 again this is the part that Mr. Greenberg
23 read, the police officer notes, "I noticed
24 that the female appeared to be young." Did

1 you look young at that time?

2 MR. GREENBERG: Objection;
3 leading.

4 THE WITNESS: Yes.

5 MR. GREENBERG: It calls for a
6 yes.

7 MR. BEZAR: Did you look young at
8 that time?

9 THE WITNESS: Yes.

10 MR. GREENBERG: Objection;
11 leading.

12 MR. BEZAR: Did the police officer
13 note that in the record right there?

14 MR. GREENBERG: Objection;
15 leading.

16 THE WITNESS: Yes.

17 MR. BEZAR: Okay. Thank you.
18 Thank you. You can continue.

19 MR. GREENBERG: Are you done?

20 MR. BEZAR: Yes.

21 MR. GREENBERG: Okay. You can
22 take that down.

23 BY MR. GREENBERG:

24 Q. What happened during this arrest after

1 you gave your correct name and your true age?

2 A. I was taken to the police district.

3 Q. Were you handcuffed?

4 A. Yes.

5 Q. Taken to the police district?

6 A. Yes.

7 Q. The Bensalem Township Police Department
8 station?

9 A. Yes.

10 Q. Okay. What happened there?

11 A. They were asking me questions.

12 Q. So this is late at night now or early in
13 the morning?

14 A. Late at night.

15 Q. Before midnight?

16 A. Yes.

17 Q. All right. What did they question you
18 about?

19 A. How did I know him, how did I meet him,
20 did I know anybody else that knew him, just
21 like those type of questions.

22 Q. For how long did they question you?

23 A. Half an hour.

24 Q. Did you tell the truth completely during

1 this questioning?

2 A. Not that I remember.

3 MR. BEZAR: Just before we go on,
4 do we have the usual stipulations that all
5 objections are preserved until the time of
6 trial?

7 MR. GREENBERG: Yes.

8 MR. BEZAR: Remind me, because
9 I'm not always good at this. Is leading --

10 MR. GREENBERG: All objections
11 except as to the form are reserved until time
12 of trial.

13 MR. BEZAR: So isn't leading
14 preserved?

15 MR. GREENBERG: Leading is form.
16 You have to object to leading if you think
17 it's improper.

18 MR. BEZAR: I learned something.
19 Okay, go ahead.

20 BY MR. GREENBERG:

21 Q. So I want to make sure you understood my
22 question and you answered it correctly.

23 During this half an hour that you
24 say --

1 MR. BEZAR: I'm sorry, I'm going
2 to interrupt. I'm not going to object to
3 leading questions. I'm going to object to
4 form questions where it assumes something or
5 there are multiple ways to answer it. I'm
6 not going to object to leading questions
7 because I think we will then, one, we won't
8 be able to move this along and we'll be here
9 for way longer than we need to be, so I will
10 not object to your leading questions and you
11 can go on. If that means they're not
12 preserved, so be it. The truth shall set
13 [REDACTED] free. Go ahead.

14 BY MR. GREENBERG:

15 Q. Miss [REDACTED] during this half an hour that
16 you say you were being questioned at the
17 Bensalem Township Police Department station,
18 did you tell the whole truth? Did you give
19 true and accurate answers to all the
20 questions?

21 A. No.

22 Q. What questions did you not answer
23 truthfully?

24 A. How did I know him and, uh, some

1 question did I -- did I choose to do
2 everything on my own.

3 Q. All right. Let's take them one at a
4 time. When you were asked how did you know
5 him, how did you answer at that time?

6 A. I don't remember.

7 Q. Why are you saying you didn't answer it
8 truthfully if you don't remember? Explain
9 that to me.

10 A. Well, I just explained to the part that
11 I do remember, which is that -- about the
12 part where did I do everything by myself, but
13 I know that I --

14 Q. I'll get to that. You said there were
15 two questions that you were asked at the
16 police station after the arrest that you did
17 not answer truthfully.

18 A. Um-hum.

19 Q. And the first one was how did I know
20 him.

21 A. Um-hum.

22 Q. So let's stick with that one for a
23 moment. Okay? I just want to try to get
24 that clear. All right?

1 A. Um-hum.

2 Q. Yes?

3 A. (Witness nodding head.)

4 Q. You have to give me an answer.

5 A. Yes. Sorry.

6 Q. Thank you.

7 You remember being asked the
8 question how did you know Daiquan Davis?

9 A. Yes.

10 Q. How did you answer it at that time?

11 A. I don't remember.

12 Q. Why are you telling me today that you
13 gave an untruthful answer to that question?

14 A. Because I know I did. I just don't
15 remember exactly what I said. I just know it
16 was dishonest.

17 Q. Do you know approximately what you said?

18 MR. BEZAR: Hold on. Do you want
19 her now to guess or sort of summarize?
20 Because this --

21 MR. GREENBERG: Her best
22 recollection.

23 MR. BEZAR: Her best
24 recollection, because this was the subject, I

1 thought we had an agreement on the number of
2 johns before and maybe I was wrong when we
3 were guesstimating. Do you -- are you
4 looking for her to give her best guess here?

5 MR. GREENBERG: Best recollection
6 if you have any. If you don't have any, then
7 we can go back to having you explain to me
8 why you say you gave a false answer.

9 MR. BEZAR: So what do you want
10 her to answer now? I'm sorry, I --

11 BY MR. GREENBERG:

12 Q. To the best of your recollection, how
13 did you answer that question when you were
14 asked at the police station how did you know
15 Daiquan Davis?

16 A. I took -- I took the blame for it all
17 and --

18 Q. You did what?

19 A. When he asked me how did I know him, I
20 mentioned something about --

21 MR. BEZAR: Do you recall --
22 sorry.

23 THE WITNESS: Something about
24 me -- I was, yeah, I was lying about it, how

1 I met him. I was saying that like he didn't
2 know exactly what was going on, yeah, it was
3 something like that. I just don't know -- I
4 don't exactly remember exactly what I said,
5 but it was something like that. I was taking
6 the blame for everything.

7 BY MR. GREENBERG:

8 Q. So what's the true answer to that
9 question how did you know him, the true
10 answer which is different than what you told
11 the police?

12 A. Through my sister.

13 Q. You met him through your sister?

14 A. Yes.

15 Q. That's the true answer?

16 A. Yes.

17 Q. And that's different from what you told
18 the police?

19 A. Yes.

20 Q. Okay. The other thing you said that you
21 were asked by the police, which you did not
22 answer truthfully, did I choose to do
23 everything? What's the whole question?

24 MR. BEZAR: You know, it's your

1 question, Ed.

2 MR. GREENBERG: No, it's what she
3 said. I'll go back.

4 MR. BEZAR: Yes.

5 BY MR. GREENBERG:

6 Q. You said the second question that you
7 did not answer truthfully was something about
8 did I choose to do everything; right?

9 A. Meaning like was I forced or like, or
10 like how did things come about.

11 Q. The prostitution?

12 A. Yes. And I didn't answer truthfully.

13 Q. How did you answer it at the time?

14 A. Um --

15 Q. At the time the police interviewed you?

16 A. I told them that he didn't know anything
17 that was going on. I just asked him to
18 protect me. That's all.

19 Q. And that wasn't true?

20 A. No, it wasn't true.

21 Q. What was true? Please try to keep your
22 voice up so we can hear you.

23 A. Um, when we got to the Roosevelt Inn
24 everything changed and he told me I was going

1 to be having sex with men for money.

2 Q. So you're saying the truth is he forced
3 you into prostitution, but when you were
4 being interviewed by the police right after
5 the arrest --

6 A. I told him that --

7 MR. BEZAR: Hold on. You've got
8 to let him finish.

9 BY MR. GREENBERG:

10 Q. -- you didn't tell him that he forced
11 you into prostitution? Is that your
12 testimony today?

13 MR. BEZAR: Objection to the
14 form. Go ahead. You throw every fact as the
15 way you wanted to articulate the facts. The
16 record reads the way the record reads. I
17 think we both know that. You don't need to
18 marshal or summarize the testimony. The
19 record is what the record is. If you have a
20 question, ask it.

21 MR. GREENBERG: Do we have an
22 answer on the record to that question?

23 (Court reporter read back as
24 requested.)

1 BY MR. GREENBERG:

2 Q. Did you tell the police when you were
3 interviewed at the police station that
4 Daiquan Davis forced you into prostitution?

5 A. No.

6 Q. But today that's your testimony;
7 correct?

8 A. Testimony?

9 Q. You testified today that he forced you
10 into prostitution?

11 A. Yes.

12 Q. Why is your testimony today different
13 from what you told the police?

14 A. Because I was afraid. I didn't know
15 what was going to happen.

16 Q. You were lying to the police?

17 A. Yes.

18 Q. Do you remember any of the dates that
19 you had at the Comfort Inn before you were
20 arrested?

21 A. No, I never been there.

22 Q. Sorry?

23 A. I've never been there.

24 Q. On the day of the arrest --

1 A. Um-hum.

2 Q. -- you said you had four dates at the
3 Comfort Inn.

4 A. Yes.

5 Q. Approximately four dates before you were
6 arrested?

7 A. Yes.

8 Q. And then the policeman came in in
9 plainclothes and you were arrested; right?

10 A. Yes.

11 Q. Do you remember any of the dates you had
12 before the policeman came in and arrested
13 you?

14 A. Oh, I thought -- okay. Before, the one
15 before the cop, it was really weird. The guy
16 was like really like stiff, not, it was like
17 a business, straight business thing to him,
18 like the way, his body language, the way he
19 was acting, it was like he was trying to make
20 sure of something before like I was arrested.

21 Q. You're talking about the policeman or
22 the john before the policeman?

23 A. Yeah, before. That's like the only one
24 I remember because it kind of made me

1 suspicious.

2 When he came in, usually guys will
3 be like easygoing, you know, like really
4 friend, I guess, and he was more like super
5 serious, like he wasn't trying to talk and he
6 was just like he just turned me around and
7 did what he did and he just left.

8 Q. How much time did he pay for?

9 A. Fifteen minutes.

10 Q. So that was a short date?

11 A. Yeah.

12 Q. At that time you were offering dates in
13 various lengths, shorter, longer, longest?

14 A. Yes.

15 Q. What were they? Fifteen minutes? What
16 else?

17 A. Fifteen minutes, thirty minutes, a hour,
18 hour and a half, two hours.

19 Q. What were the prices for those dates?

20 A. Fifteen minutes, 60 dollars; thirty
21 minutes, 85; an hour, 120; two hours,
22 negotiable. Anything else would be
23 negotiable.

24 MR. GREENBERG: Put up BTPD9,

1 please, and let's focus in on this paragraph.

2 BY MR. GREENBERG:

3 Q. We're now on Page 9 of the police
4 report, BTPD9, Ms. [REDACTED]

5 A. Yes.

6 Q. I'd like you to follow along with me
7 either on the paper copy or the one on the
8 screen. We're looking at a paragraph that
9 begins "She said." Do you see that?

10 A. Yes.

11 Q. "She said that she supplies the
12 condoms."

13 Are you with me?

14 A. Yes.

15 Q. "She said that Davis leaves the room
16 when the dates arrive. [REDACTED] admitted
17 to doing one date today at 1900 hours."

18 That's 7:00 p.m., do you
19 understand that?

20 A. Um-hum.

21 Q. Yes?

22 A. Yes.

23 Q. "She said that a white male paid her
24 \$180 for an hour stay but he, quote, busted

1 in two minutes and left period, close quote.
2 She told me that she stayed at the Motel 6
3 yesterday and she did three dates. She made
4 a \$60 date, a \$100 date, and \$180 date. She
5 said that the most dates that she did in one
6 day was six. She then told me that she
7 didn't like doing dates."

8 Did I read that paragraph
9 correctly?

10 A. Yes.

11 Q. So according to this report from the
12 police, you admitted to one date on the day
13 of the arrest?

14 A. Um-hum.

15 MR. BEZAR: Objection to the
16 form.

17 BY MR. GREENBERG:

18 Q. \$180?

19 MR. BEZAR: It says "one date
20 today" and it says a time. It doesn't say
21 one date on the day of arrest. If you want
22 to ask the question --

23 MR. GREENBERG: Don't make
24 speaking objections. Just note your

1 objection.

2 MR. BEZAR: Objection. Look at
3 what you're doing. She's a young girl.

4 MR. GREENBERG: Come on.

5 MR. BEZAR: Look at what you're
6 doing. It says "one date today at 1900
7 hours." It doesn't say one date today.

8 MR. GREENBERG: This is not the
9 time to argue what it means. I'm asking her
10 questions. I'm doing it on the record.

11 MR. BEZAR: You're not asking her
12 questions, you're making a speech, Ed.

13 MR. GREENBERG: Just note your
14 objection.

15 MR. BEZAR: No, I can do it. I'm
16 going to represent my client the way I want
17 to represent, and if you bring me before a
18 judge and I am told I've done something
19 wrong, I will look at you, I will apologize,
20 and then I will bring my client back if so
21 instructed.

22 But for now, Ed, you are
23 representing that she did one date that day.
24 It says "one date today at 1700 hours" or

1 "1900 hours." I apologize.

2 MR. GREENBERG: Please note that
3 on the record, Donna, that space.

4 MR. BEZAR: Ask a fair question.

5 MR. GREENBERG: Are you done?

6 MR. BEZAR: It depends what you
7 ask. Like you, Ed, I'm representing my
8 client.

9 MR. GREENBERG: You're making
10 speaking objections. You're coaching the
11 witness. It's absolutely not proper.

12 MR. BEZAR: I am absolutely not
13 coaching the witness.

14 MR. GREENBERG: It's established
15 law of this jurisdiction. It's not proper.
16 Okay.

17 MR. BEZAR: Can you just cite me
18 to something and then we'll read it while I
19 sit here and if it says I'm not allowed to
20 represent my client when there are misleading
21 questions, I promise I will stop?

22 You are clearly on top of the law,
23 Ed. You can tell me what to do. You can
24 school me as much as you want, but I'm still

1 going to represent my client. And if you ask
2 me if I'm done again, the answer is yes, I
3 will continue to represent my client. Your
4 turn.

5 MR. GREENBERG: Thank you.

6 BY MR. GREENBERG:

7 Q. Miss [REDACTED] --

8 A. Yes.

9 Q. -- the police report says that you
10 admitted to doing one date today at 1900
11 hours.

12 A. Yes.

13 Q. Do you see that?

14 A. Um-hum.

15 Q. On the day that you were arrested at the
16 Comfort Inn, did you do any dates other than
17 at the Comfort Inn?

18 A. No.

19 Q. So all of the dates, whatever dates you
20 did on the day you were being questioned by
21 the police, you did at the Comfort Inn;
22 correct?

23 A. Yes.

24 Q. Okay. And when they were questioning

1 you at the police station that night and you
2 were answering questions about doing dates
3 that day, what motel were you talking about?

4 A. Say that --

5 Q. You were talking about the Comfort Inn?

6 A. Yes.

7 Q. Okay. So it says you admitted doing one
8 date today at 1900 hours and you said that a
9 white male paid you \$180 for an hour stay but
10 he busted in two minutes and left. What does
11 "busted in two minutes and left" mean?

12 A. Ejaculated.

13 Q. Within two minutes?

14 A. Um-hum.

15 Q. Yes?

16 A. Yes.

17 Q. So he paid for an hour and he stayed for
18 two minutes?

19 A. Yes.

20 Q. Did you tell the police about the date
21 that you described --

22 MR. BEZAR: It actually says he
23 busted in two minutes. That means he
24 ejaculated in two minutes. It doesn't say he

1 stayed for two minutes.

2 BY MR. GREENBERG:

3 Q. How long did he stay?

4 A. I guess the two minutes he was there and
5 he left.

6 Q. He didn't stay for the hour; right?

7 A. No.

8 MR. BEZAR: That's a proper
9 question.

10 BY MR. GREENBERG:

11 Q. He left shortly after he was finished?

12 A. Yes.

13 Q. Did you tell the police about this
14 fifteen-minute date that you described today?

15 A. No.

16 Q. Why?

17 A. I didn't want to give too much
18 information.

19 Q. Why?

20 A. Because I was scared. I didn't know
21 what was going to happen to me.

22 Q. So when the police were questioning you
23 about the dates you did that day, you were
24 lying about that also?

1 A. No. I just didn't want -- I didn't want
2 to give too much information. There were so
3 many things that I knew.

4 Q. Do you think there is a difference
5 between withholding information when you
6 don't want to give too much information and
7 lying about things? Is that different to
8 you?

9 A. No. If I'm holding the information and
10 telling different information, I'm still not
11 giving the information I want to give up and
12 I'm still lying, so either way.

13 Q. Did you have a knife in your possession
14 when you were arrested?

15 A. Yes.

16 Q. What kind of a knife was it?

17 A. A pocket knife.

18 Q. When you say a pocket knife, could you
19 describe it?

20 A. No.

21 Q. In the police report it was described as
22 a sheetrock knife which sounds to me like a
23 box cutter or utility knife. Do you know
24 what those look like?

1 A. Yes.

2 Q. It's got a little button slide on top of
3 it and you can slide the little triangle
4 blade --

5 A. And it will come right out.

6 Q. -- out or put it back in?

7 A. Um-hum, yes.

8 Q. Is that what you had?

9 A. Yes.

10 Q. Why were you carrying that?

11 A. Protection.

12 Q. Protection against who?

13 MR. BEZAR: From whom?

14 MR. GREENBERG: Yeah.

15 BY MR. GREENBERG:

16 Q. Do you need a break?

17 A. I had it on me because one of the dates
18 I had had raped me.

19 MR. BEZAR: Can we take a break
20 now? There is no question on the table.

21 MR. GREENBERG: I'd like to have
22 some follow-up. I'd like to know what that
23 was about.

24 MR. BEZAR: You absolutely can

1 have follow up. I didn't want to take the
2 break while she was crying while there was a
3 question on the table. Can we just let her
4 walk?

5 MR. GREENBERG: Sure.

6 MR. BEZAR: Okay.

7 VIDEO SPECIALIST: Off the video
8 record at 1:35.

9 (Discussion held off the record.)

10 VIDEO SPECIALIST: We're back on
11 the video record at 1:41.

12 BY MR. GREENBERG:

13 Q. Ms. [REDACTED] before we took a break I was
14 asking you about the knife you had in your
15 possession at the time of your arrest. You
16 described it for me and I think you agree
17 that it was a utility knife, that type of
18 knife with a blade that slides in and out?

19 MR. BEZAR: Objection. She
20 didn't say the blade slides in and out. Why
21 don't we ask a question here.

22 MR. GREENBERG: That was my
23 recollection.

24 BY MR. GREENBERG:

1 Q. Ms. [REDACTED] were you carrying a knife that
2 has a retractable blade, you can slide the
3 blade in to put it safely in your pocket, you
4 can take it out and slide the blade out to
5 use it?

6 A. Yes.

7 Q. And is it the kind of knife you get in a
8 hardware store that can be used to cut boxes
9 or other materials?

10 A. Yes.

11 Q. And I asked you why you had that in your
12 possession and you said something about an
13 experience where you were raped and I want to
14 ask you about that.

15 When did that happen and who did
16 that?

17 A. It was --

18 Q. Please keep your voice up.

19 A. It was at the -- the Motel 6 and it
20 was -- it was a date I had in the room and
21 when the guy got there I didn't have any more
22 condoms, and he took me to the gas station
23 and it was closed, to get some more, and we,
24 he paid me. I ordered --

1 Q. Stop, stop. The videographer is making
2 signs like your microphone is too low.

3 VIDEO SPECIALIST: It's hitting
4 the table, yes. If you could move it closer.

5 MR. GREENBERG: Put it higher up
6 on your shirt.

7 (Witness complies.)

8 VIDEO SPECIALIST: Thank you very
9 much.

10 THE WITNESS: And we did a date
11 and he left, and then I ordered some food,
12 and I thought it was my food, but it was the
13 guy at the door.

14 BY MR. GREENBERG:

15 Q. The same guy that you had just had a
16 date with?

17 A. Yes.

18 Q. Do you need to stop again? No?

19 A. And when he opened the door he just
20 pushed me on the bed and he was a really big
21 guy, he was like six six, like 300 something
22 pounds, and he was really light skinned, he
23 was a black guy, and he just did what he did.
24 He left.

1 Q. And that's why you got a knife?

2 A. Yes.

3 Q. I take it he did not pay for that?

4 A. No.

5 Q. No, he did not?

6 A. No.

7 Q. No what?

8 A. He did not pay for it.

9 Q. Did you have injuries?

10 A. No.

11 Q. You didn't go to the hospital or a
12 doctor?

13 A. No.

14 Q. Did you do any dates that night after
15 that?

16 A. Yes.

17 Q. Did you report that to the police?

18 A. No.

19 Q. Did you tell anyone about it?

20 A. No.

21 Q. Today is the first day you're mentioning
22 it to anyone?

23 MR. BEZAR: Objection to the
24 form. Well, it's not an objection to form

1 other than any conversations we might have
2 had.

3 BY MR. GREENBERG:

4 Q. I'm not asking you about your
5 conversations with your attorneys. Other
6 than those, have you ever told anybody about
7 this incident?

8 A. A few friends, old friends that I have,
9 but I did not, no.

10 Q. What friends did you talk to about this?

11 A. Um, old girlfriends I don't talk to
12 anymore. Old girlfriends I no longer speak
13 to.

14 Q. Did you tell Mr. Davis about it?

15 A. No.

16 Q. Why?

17 A. He wasn't there and I kind of, I don't
18 know, I just thought, you know, I just needed
19 somewhere to sleep and eat and things like
20 that, so I just didn't say anything about it.

21 Q. You said he wasn't there. Where was he?

22 A. He was at work.

23 Q. He was at the Ruth Chris restaurant
24 while you were doing dates in the room?

1 A. Yes.

2 Q. Did that happen often, you were left
3 alone at the motel?

4 A. Yes.

5 Q. At whatever motel you were at while he
6 was working at the restaurant, you were doing
7 dates?

8 A. Yes.

9 Q. And you had nobody to protect you?

10 A. No.

11 Q. How often did that happen?

12 A. What?

13 Q. That he left you alone doing dates in a
14 hotel room.

15 A. All the time unless he had a day off or
16 couldn't get to work.

17 Q. Please keep your voice up.

18 How many days a week did he go to
19 work at this restaurant?

20 A. Five.

21 Q. Did he work nights mostly?

22 A. No, during the day.

23 Q. So he would sometimes be back while you
24 were doing dates at night?

1 A. Yes.

2 Q. But sometimes before he came back you
3 were doing dates without him there?

4 A. Yes.

5 Q. And you say it happened often?

6 A. Yes.

7 Q. And you didn't leave because you needed
8 a place to stay?

9 A. Yes.

10 Q. Did you do any dates at any time after
11 your November 7th arrest?

12 A. No.

13 Q. That was the end of your trafficking and
14 prostitution?

15 A. Yes.

16 Q. And when I say the November 7th arrest,
17 you understand I mean November 7, 2014?

18 A. Yes.

19 Q. Did you ever stay in any of these
20 motels, hotels, after November 7th, 2014?

21 A. No.

22 Q. Do you know whether Mr. Davis went back
23 to prostitution after the November or
24 trafficking I should say after the November

1 7, 2014, arrest?

2 A. Yes.

3 Q. When?

4 A. Um, when I was transferred from Bucks
5 County to Philadelphia County, um, he wrote
6 me a letter and when I got to Child First and
7 I gave him a call, he was trying to get me to
8 recruit girls to run away back to
9 Philadelphia to work for him, and I told him
10 no.

11 Q. Okay. I'm confused so I have to ask you
12 some questions to break this down.

13 A. Um-hum.

14 Q. When you were arrested on November 7th,
15 you were taken to the Bucks County, the
16 Bensalem Township Police Department's station
17 and you were questioned late into the night;
18 correct?

19 A. Yes.

20 Q. When they finished questioning you,
21 where did they transport you to?

22 A. Bucks County Youth Center. Bucks County
23 Youth Center.

24 Q. Is that also known as Edison, do you

1 know?

2 A. No.

3 Q. You don't know. Do you know where the
4 Bucks County Youth Center is?

5 A. In Bucks County.

6 Q. That's as much as you can tell me?

7 A. Yeah.

8 Q. Okay.

9 MR. BEZAR: That's a good answer.
10 That's a good answer.

11 BY MR. GREENBERG:

12 Q. How long were you in that facility?

13 A. About two weeks, two and a half weeks.

14 Q. What happened during that two and a half
15 weeks? Did you appear in front of a district
16 justice at some point?

17 A. Yes.

18 Q. When did that happen? How long after
19 the arrest?

20 A. I would say a week. A week, a couple
21 days.

22 Q. A couple days to a week?

23 A. Yes.

24 Q. What happened at that court hearing?

1 A. Um, I don't remember. It just seemed as
2 though they were trying to like just get me
3 to plead guilty so they can I guess transfer
4 me. I don't know.

5 Q. Plead guilty to what?

6 A. Prostitution.

7 Q. Were you also charged with possession of
8 marijuana at that time?

9 A. Yes.

10 Q. And possession of drug paraphernalia?

11 A. Yes.

12 Q. So the three charges were in Bucks
13 County; right?

14 A. Yes.

15 Q. So you appeared in front of a district
16 justice in a small courtroom?

17 A. Yes.

18 Q. And you don't really remember what
19 happened there other than they were trying to
20 get you to plead guilty?

21 A. Yeah. It was a really short court date.
22 It was just five minutes.

23 Q. Did you have a lawyer?

24 A. I'm pretty sure I had a public defender,

1 yeah.

2 Q. What happened after that court
3 appearance? Did you go back to the same --

4 A. Yes.

5 Q. -- jail?

6 A. Yes, um-hum.

7 Q. Okay. How long did you stay in the
8 Bucks County, what did you call it, Youth
9 Center?

10 A. Yes.

11 Q. It's a jail?

12 A. Yes.

13 Q. How long did you stay there after that
14 court hearing to the best of your
15 recollection?

16 A. About another week.

17 Q. Another week?

18 A. Yeah.

19 Q. Had you heard from Mr. Davis at all
20 during that approximately two-week period you
21 were in the Bucks County Juvenile Center?

22 A. No.

23 Q. Where were you transferred after that?

24 A. JJC, Juvenile Justice Center.

1 Q. In Philadelphia?

2 A. Yeah.

3 Q. Were there charges against you in
4 Philadelphia?

5 A. No.

6 Q. Was there an outstanding warrant or
7 something from DHS?

8 A. Not that I know of, no.

9 Q. Do you know why you were transferred to
10 Philadelphia?

11 A. Because that's where my case was, DHS,
12 with DHS.

13 Q. So they transferred you to the JJC and
14 how long did you stay there?

15 A. Less than 24 hours.

16 Q. Was there a hearing? Did you appear in
17 front of a judge or somebody in that day?

18 A. Yes.

19 Q. Who did you appear in front of?

20 A. I don't know. It was inside the JJC
21 building.

22 Q. Was it on a video hookup or were you in
23 a live -- in front of a live judge?

24 A. In front of a live judge.

1 Q. What happened there?

2 A. I don't remember. It was really short.

3 Q. Where did you go from there?

4 A. Back downstairs to, in the JJC.

5 Q. Okay. And how long were you in the JJC
6 after that hearing?

7 A. 13 hours.

8 Q. And then where did you go?

9 A. Vision Quest.

10 Q. Vision Quest?

11 A. Vision Quest.

12 Q. Which you already told us is in
13 Philadelphia?

14 A. Um-hum. Yes.

15 Q. 5201 Old York Road?

16 A. Yes.

17 Q. And you were locked into that facility?

18 A. Yes.

19 Q. For how long?

20 A. About four months.

21 Q. So you got there in late November. You
22 spent two weeks in the Bucks County Juvenile
23 Center?

24 A. Um-hum.

1 Q. A day in the JJC?

2 A. Yes.

3 Q. So it's late November?

4 A. Right.

5 Q. And you spent four months in Vision
6 Quest, so that would be December, January,
7 February, into March?

8 A. Oh, no, no. That's a mistake then
9 because January 9th is the day I went to
10 Child First.

11 Q. You were what?

12 A. So --

13 MR. BEZAR: She said January 9th.

14 THE WITNESS: January 9th, so
15 that's a mistake. Sorry. It was two months.

16 BY MR. GREENBERG:

17 Q. Okay. What happened on January 9th?

18 A. I was transferred from Vision Quest to
19 Child First Services.

20 Q. That's 2015; right?

21 A. Yes.

22 Q. Why were you transferred to Child First
23 Services?

24 A. Um, they found me a placement.

1 Q. Was that a better place for you to be,
2 less like a jail?

3 A. Yes.

4 Q. And this was up in the Poconos?

5 A. Yes.

6 Q. So you were at Child First from January
7 9, 2015, until when?

8 A. April 14, 2015.

9 Q. Where did you go then?

10 A. Back to JJC.

11 Q. Why?

12 A. I got into a fight at the East
13 Stroudsburg Mall.

14 Q. Okay. So let's go back to the question
15 that you answered previously when I really
16 didn't understand the answer.

17 I had asked you did Daiquan Davis
18 go back to trafficking after the November
19 7th, 2014, arrest, and you told me that you
20 heard from him. So when is the first time he
21 communicated with you?

22 A. Um, in Vision Quest, when I was there
23 the first time, I wrote him a letter to his
24 job stating that I don't want any more

1 contact with him. I'm, you know, basically
2 done with all the things we were doing and I
3 was moving forward with my life.

4 Q. You sent the letter to Ruth Chris?

5 A. Yes.

6 Q. Why did you send it there?

7 A. Because he didn't have any address.

8 Q. You didn't know where else to send it?

9 A. No.

10 Q. Is that correct?

11 A. Yes.

12 Q. So you sent him that letter some time
13 between January 9, 2015, and April 14th,
14 2015? You sent it --

15 A. No, it was 2014.

16 Q. Oh, that's Child First?

17 A. Yeah. That was before, yeah.

18 Q. You sent it to him some time in --

19 A. November.

20 Q. -- November or December or are you
21 saying November?

22 A. November, December, yeah. I would say
23 November.

24 Q. November 20 --

1 A. '14.

2 Q. -- 14?

3 A. Yeah.

4 Q. You sent him a letter saying we're done,
5 I don't want anything more to do with you?

6 A. Yes.

7 Q. Why did you send him that letter?

8 A. Um, because he was very controlling and
9 I felt as though if I was to, you know, put,
10 get put somewhere like a group home and I'll
11 be able to roam the streets if the case may
12 be and he seen me, like, you know, I just
13 wanted him to understand that I'm not my
14 sister, you can't control me, I'm done, and
15 once I realized that, like once I was
16 arrested I realized that this isn't the life
17 and that's why.

18 Q. So you told him that you would not be
19 trafficked any longer?

20 A. Yes.

21 Q. Did he respond?

22 A. Yes.

23 Q. How?

24 A. He disregarded everything I said. He

1 wrote it in like a Gmail letter.

2 Q. An e-mail, you mean?

3 A. Yeah, yeah. Sorry, yes. And he was
4 basically saying he missed me. He was
5 talking bad about my sister. He was saying
6 he can't wait until I come home and he was
7 trying to find me and that was basically, he
8 gave me his phone number and told me to call
9 him.

10 Q. Didn't you already know his phone
11 number?

12 A. Yeah.

13 Q. Do you have that Gmail?

14 A. No. The FBI has it.

15 Q. Did it come to you on your phone?

16 A. No, it came to me as a letter to Vision
17 Quest. People could write you when you're
18 arrested, so I received a letter. I guess
19 they didn't know who he was. They wasn't
20 supposed to give me the letter and I read it
21 and then I gave it back, you know.

22 Q. You have a cell phone now; correct?

23 A. Yes.

24 Q. You get e-mail and text messages on your

1 cell phone?

2 A. Yes.

3 Q. When did you first get a cell phone?

4 A. When I came home from Vision Quest
5 January 28th, 2016.

6 Q. Did you say January 28th, 2016?

7 A. Yes.

8 Q. Was that a smart phone that enabled you
9 to have e-mail and texts and internet?

10 A. Yes.

11 Q. Is your phone number now the same as the
12 phone number that you got on that date?

13 A. No.

14 Q. When did it change?

15 A. Several -- I don't even remember.

16 Q. Why?

17 A. Safety concerns, you know.

18 Q. What is your e-mail address now?

19 MR. BEZAR: She's not going to
20 provide that. You can send me a discovery
21 request and I'll provide it. You're going to
22 contact me for any information regarding her.
23 You don't need to e-mail her.

24 MR. GREENBERG: I have no

1 intention of e-mailing her, Mr. Bezar. I'm
2 asking her for her e-mail address and I want
3 to know what e-mail addresses she had before
4 that so that we can follow up with --

5 THE WITNESS: Oh, it's the same
6 e-mail address.

7 BY MR. GREENBERG:

8 Q. So what is it?

9 MR. BEZAR: No, she's not going
10 to give it to you. You can send a discovery
11 request to me.

12 MR. GREENBERG: That's another
13 instruction not to answer. Please note it.

14 MR. BEZAR: Why did you just call
15 me by my last name? Why didn't you just call
16 me Nadeem like I have been calling you Ed? I
17 thought that was a little bit formal, don't
18 you?

19 MR. GREENBERG: This is a formal
20 proceeding, sir.

21 MR. BEZAR: I know, but do you
22 want me to call you Mr. Greenberg? I have
23 been calling you Ed.

24 MR. GREENBERG: Whatever you want

1 to do is fine. Let's just go ahead. I don't
2 want to argue with you.

3 MR. BEZAR: We're not arguing.
4 I'm asking you just about etiquette.

5 MR. GREENBERG: I just want to
6 finish the deposition, so let me do that.

7 MR. BEZAR: Absolutely.

8 MR. GREENBERG: There are other
9 lawyers that want to ask questions.

10 MR. BEZAR: Have I been
11 disrespectful by calling you Ed?

12 MR. GREENBERG: No, that's fine.
13 Call me whatever you want.

14 MR. BEZAR: Fair enough.

15 Hold on a second. We have a mic.

16 BY MR. GREENBERG:

17 Q. He wrote to you, he, Mr. Davis, wrote to
18 you while you were at Vision Quest, so that
19 was some time before January 9th, 2015?

20 A. Yes.

21 Q. And he was not in jail at that time?

22 A. No.

23 Q. Do you know how it was that after he was
24 arrested on November 7th, 2014, he got out of

1 jail?

2 A. I would believe it's because I like
3 tried to take the blame for everything.
4 Other than that, I don't know. I watched him
5 walk out.

6 Q. I'm sorry? You watched him walk out?

7 A. I seen him walk out the police station,
8 but yeah, I don't know what -- I don't know
9 what that was about. I don't know.

10 Q. When did he walk out of the police
11 station?

12 A. Before I was transferred to Bucks
13 County.

14 Q. So that would have been either on
15 November 7th or the early --

16 A. November 8th.

17 Q. -- or the early hours of November 8th?

18 A. Yeah.

19 Q. And as far as you know, he was -- he was
20 not incarcerated until some time later?

21 A. Yes, February 18th he was arrested of
22 2015.

23 Q. February what date?

24 A. 18th.

1 Q. 2015?

2 A. Um-hum.

3 Q. Yes?

4 A. Yes.

5 Q. Where did you get that date?

6 A. I was there.

7 Q. Where?

8 A. He came to my court date. He wasn't
9 supposed to be there and they arrested him.

10 Q. Where was your court date?

11 A. Family court.

12 Q. When you say he wasn't supposed to be
13 there --

14 A. Yes.

15 Q. -- was there an order against contact, a
16 protection from abuse order or something
17 else?

18 A. No.

19 Q. When you say he wasn't supposed to be
20 there, what do you mean by that?

21 A. They knew who he was.

22 Q. Who is the "they"?

23 A. My judge, everybody knew who he was.

24 They had pictures and they knew his name and

1 when he came he was giving his name out like
2 he was the man, so he got arrested.

3 Q. Do you know if he regained his freedom
4 after that or has he been in prison
5 consistently from that point on?

6 A. Yes, from that point on he was arrested
7 and never released.

8 Q. So going back to the communication
9 between you and him --

10 A. Um-hum.

11 Q. -- you wrote him a letter. He responded
12 by sending something to Vision Quest that was
13 given to you? You told me you read it and
14 you gave it back to the people at Vision
15 Quest?

16 A. Yes.

17 Q. Did you have any communication with
18 Mr. Davis any time after that?

19 A. Yes.

20 Q. When?

21 A. The day I was being driven to Child
22 First.

23 Q. What happened?

24 A. I called him.

1 Q. You called him how?

2 A. On one of the staff cell phone.

3 Q. Somebody let you use their phone?

4 A. Yes.

5 Q. You used their phone?

6 A. Yes.

7 Q. What was that, about a three-hour drive?

8 A. Yes. Yeah, I wasn't on the phone for
9 three hours.

10 Q. No, I understand, but it was a long ride
11 from Vision Quest to Child First?

12 A. Yes.

13 Q. Why did you call him?

14 A. Because I felt as though he just like
15 wasn't getting it. I felt as though he
16 wasn't getting my message from me writing him
17 in Vision Quest when he wrote me back, so I
18 gave him a call to like, you know, tell him
19 like I'm serious. He didn't take me serious.

20 Q. Even during that call?

21 A. Yes.

22 Q. How do you know he didn't take you
23 seriously in that call?

24 A. Because he was like really excited to

1 hear from me, like he was, I don't know, he
2 just seemed excited and he was like I miss
3 you and I can't wait to see you again. Like
4 he was just disregarding everything I said.

5 Q. January 9th, 2015?

6 A. Yes.

7 Q. And you know it was that day because
8 that's the day you were transferred from --

9 A. Vision Quest.

10 Q. -- Vision Quest to Child First?

11 A. Yes.

12 Q. That's the day you drove up from the
13 Poconos?

14 A. Yes.

15 Q. Or you were driven?

16 A. Yes.

17 Q. How long did that call last?

18 A. Ten minutes.

19 Q. Did you have any communication with him
20 after that?

21 A. Yes.

22 Q. When?

23 A. I called my mother one day.

24 Q. Who did?

1 A. Me. I called my mother one day and he
2 was at my mother's house eating dinner, and I
3 was wondering why, and then I didn't want to
4 scare my mom, she didn't know what was going
5 on, so I didn't say anything to her like
6 about, oh, he shouldn't be there, things like
7 that, you know.

8 He just like came to my mom house
9 one day and was like I'm [REDACTED]'s boyfriend.
10 He told my mother that I was his girlfriend
11 and we were serious and she let him in and
12 they had dinner together and I guess he got
13 her good because she believed him, and when I
14 called they were like there together.

15 Q. When did that happen?

16 A. I would say a couple days after I was at
17 Child First.

18 Q. After, shortly after January 9, 2015?

19 A. Yes.

20 Q. And you just said she didn't know what
21 was going on. What did you mean by that?

22 A. She didn't know that I was on back page
23 for, you know, doing the whole prostitution
24 thing.

1 Q. Did she know you had been sent to Vision
2 Quest?

3 A. Yes.

4 Q. She didn't know why?

5 A. No.

6 COURT REPORTER: Ed, can we go
7 off the record?

8 VIDEO SPECIALIST: Going off the
9 record at 2:07.

10 (Discussion held off the record.)

11 VIDEO SPECIALIST: We are back on
12 the video record at 2:16.

13 BY MR. GREENBERG:

14 Q. Before the break you testified that you
15 called your mother and you discovered that
16 Daiguan Davis was having dinner with her in
17 her house and I think you said this happened
18 after you were transferred on January 9,
19 2015?

20 A. Yes.

21 Q. So this phone call happened after the
22 phone call you had with Mr. Davis from the
23 transport vehicle?

24 A. Yes.

1 Q. How long did this call last?

2 A. About a half hour.

3 Q. What was the conversation about?

4 A. Um, I was mostly just talking to my mom
5 about how Child First was so far, and my mom,
6 all three of us were having a conversation,
7 found out that our family knows each other,
8 and that was it.

9 Q. You mean Mr. Davis' family and your
10 family know each other, is that what you
11 mean?

12 A. Um-hum. Yes.

13 Q. How do they know each other?

14 A. I don't know.

15 Q. Did you speak to him at all while you
16 were on the phone for 30 minutes?

17 A. Yes.

18 Q. What was that conversation about?

19 A. He was talking about us living together
20 when I'm released from Child First.

21 Q. And what did you say about that?

22 A. No.

23 Q. What else was discussed?

24 A. He was asking me if I knew any girls

1 that wanted to be escorts and like he was
2 trying to get me to convince girls to run
3 away from Child First and go to him to work
4 for him.

5 Q. And what did you say to that?

6 A. No.

7 Q. During this call did you tell him again
8 you wanted nothing to do with him and you
9 were not going to be trafficked by him?

10 A. Yes.

11 Q. Did he accept that?

12 A. No.

13 Q. From what you could tell?

14 A. Yes.

15 Q. What did he do or say during this call
16 that made you feel he wasn't accepting it?

17 A. He showed up at my court date the next
18 month.

19 Q. That was January 28th, you said?

20 MR. BEZAR: I think you said
21 February.

22 THE WITNESS: February 18th I had
23 a court date.

24 MR. GREENBERG: Yes, my mistake.

1 THE WITNESS: Yes.

2 MR. GREENBERG: I looked at the
3 wrong thing. February 18th, 2015.

4 BY MR. GREENBERG:

5 Q. I assume your mother was at that court
6 date as well?

7 A. Yes.

8 Q. She had to be; right?

9 A. Yes.

10 Q. During the 30-minute call to your
11 mother's house, how much of that time did you
12 spend on the phone with Mr. Davis?

13 A. Fifteen minutes.

14 Q. So this phone call to your mother's
15 house happened some time between January 9th,
16 2015 and February 8th, 2015?

17 A. Yes. February 18th.

18 Q. Right. Can you give me an approximate
19 date for this phone call?

20 A. (Witness shakes head.)

21 Q. No?

22 A. No.

23 Q. You don't know if it was January or
24 February?

1 A. It was January, but I don't know exactly
2 the day.

3 Q. Okay. It was January after January 9th?

4 A. Yes.

5 Q. Do you know how Mr. Davis knew about
6 your court date?

7 A. My mom.

8 Q. How do you know that?

9 A. That's the only way I could think of.

10 Q. So you're guessing that your mother told
11 him?

12 A. Yes.

13 Q. Where did you go --

14 MR. BEZAR: Sorry. Just one
15 second. Just one second.

16 (Pause.)

17 MR. BEZAR: Go ahead.

18 BY MR. GREENBERG:

19 Q. Where did you go to live after the
20 February 18th, 2015 court date?

21 A. Child First.

22 Q. Back where you were?

23 A. Yes.

24 Q. What happened at that court date besides

1 Mr. Davis being arrested?

2 A. Um, just a review, um, information about
3 the case. That's all it -- that's all it
4 ever really is.

5 Q. Information about the what?

6 A. My case.

7 Q. And that was in front of Judge Dumas?

8 A. Yes.

9 Q. Were you seeing Malik? Tell me his last
10 name again.

11 A. Brookins.

12 Q. Were you seeing Malik Brookins while you
13 were in Vision Quest or Child First?

14 A. Child First.

15 Q. Was he coming to visit you?

16 A. No.

17 Q. Or just calling you?

18 A. Yeah, we were calling each other.

19 Q. And you considered him your boyfriend at
20 that time?

21 A. Yes.

22 Q. When did your stay at Child First end?

23 A. April 14th, 2015.

24 Q. Where did you go at that point?

1 A. JJC.

2 Q. Why were you transferred to the JJC?

3 A. Because of the fight that happened at
4 East Stroudsburg Mall.

5 Q. Judge Dumas sent you back to --

6 A. Yes.

7 Q. -- JJC?

8 A. Yes.

9 Q. And how long did you stay at the JJC?

10 A. Three months.

11 Q. Were you still talking to Malik Brooking
12 during that time?

13 A. Yes.

14 Q. How did you and he keep in touch? Did
15 you have a phone?

16 A. Through the phone calls we were allowed
17 to have.

18 Q. They were a phone available for you
19 there?

20 A. Yeah.

21 Q. So that's not a cell phone, it's a land
22 line?

23 A. Yeah.

24 Q. Where did you go after the three months

1 at the JJC?

2 A. Vision Quest.

3 Q. What date was that?

4 A. I would say July.

5 Q. 2015?

6 A. Yes.

7 Q. So is this your second time going to
8 Vision Quest?

9 A. Yes.

10 Q. And how long did you stay that time?

11 A. Um, July to January 28th.

12 Q. January?

13 A. 28th, 2016.

14 Q. What happened on that date?

15 A. I was released into SIL.

16 Q. SIL stands for something independent
17 living?

18 A. Supervised independent living.

19 Q. Judge Dumas ordered that?

20 A. Yes.

21 Q. And did DHS help you get an apartment?

22 A. Yes.

23 Q. What was the address?

24 A. 4720 Pine Street.

1 Q. And that's when Malik came to live with
2 you?

3 A. Yes.

4 Q. And you stayed there until when?

5 A. March.

6 Q. March of 2016?

7 A. Yes.

8 Q. What happened then?

9 A. I went to another apartment.

10 Q. Where was that?

11 A. I don't remember.

12 Q. Do you remember approximately where it
13 was?

14 A. Germantown.

15 Q. Why did you change apartments?

16 A. Because of Malik.

17 Q. What does that mean?

18 A. The domestic violence. I moved away.
19 He knew where I lived. They moved me.

20 Q. DHS found you a different location for
21 your safety, is that it?

22 A. Yes.

23 Q. And how long did you stay in this
24 apartment in Germantown?

1 A. Two weeks.

2 Q. And then what?

3 A. I went to a mother baby group home
4 called Northern Children Services.

5 Q. When did that start?

6 A. I don't remember.

7 Q. But that would have been March or April
8 of 2016?

9 A. Yes.

10 Q. Why did you go to a mother baby group
11 home? Were you pregnant at that point?

12 A. Yes.

13 Q. With your first child?

14 A. Yes.

15 Q. How long did you stay there?

16 A. Six months.

17 Q. Were you living there when [REDACTED] was
18 born?

19 A. Afia?

20 Q. Afia?

21 A. No.

22 Q. You left there before you gave birth?

23 A. Yes.

24 Q. Where did you go?

1 A. Reena Neeley, foster home.

2 Q. You had been there before or not?

3 A. No, that was my first time.

4 Q. So when did you first go there?

5 A. It was August.

6 Q. August 2016?

7 A. Yes.

8 Q. And Afia was born in December?

9 A. Yes.

10 Q. So you spent the last few months of your
11 pregnancy there?

12 A. Yes.

13 Q. So let's go back, let's go back to the
14 subject of your communications with Daiquan
15 Davis. You already told me you wrote him a
16 letter. He then sent a letter to you at
17 Vision Quest.

18 A. Yes.

19 Q. You called him from the car while you
20 were being transported or whatever the
21 vehicle was?

22 A. Yes.

23 Q. You spoke to him when you were at your
24 mother's house?

1 A. Yes.

2 Q. When he was at your mother's house?

3 A. Yes.

4 Q. And you told me that was in January of
5 2015?

6 A. Yeah.

7 Q. Did you ever speak to him again after
8 that?

9 A. No.

10 Q. So you saw him when he got arrested at
11 your February hearing --

12 A. Yes.

13 Q. -- in Philadelphia?

14 A. I didn't physically see him get
15 arrested, but I knew he was arrested.

16 Q. Was he in the courtroom with you?

17 A. No.

18 Q. Where did the arrest happen?

19 A. Outside of the courtroom.

20 Q. So you didn't see that --

21 A. Outside of the courthouse when he left.

22 Q. On the street it happened?

23 A. Yes.

24 Q. When he left the courthouse?

1 A. Yes.

2 Q. How did you know about that? Did
3 somebody tell you about that?

4 A. Yes. Yeah, eventually when the
5 investigation with the FBI was going on and
6 we were having the conversation, he told me.

7 Q. Who is "we," we were having --

8 A. Me and the FBI agents.

9 Q. Which one?

10 A. I believe it was Agent Rose.

11 Q. Rose?

12 A. Yes.

13 Q. First name?

14 A. I don't know. I think that is her first
15 name. Rose is her first name.

16 Q. You don't know her last name?

17 A. No.

18 Q. How many different FBI agents did you
19 talk to?

20 A. Four.

21 Q. How many men, how many women?

22 A. Two men and, yeah, two women.

23 Q. Do you know any of the names other than
24 Rose, the names of the other three?

1 A. No.

2 Q. How many meetings did you have with FBI
3 agents?

4 A. I don't remember.

5 Q. More than 10?

6 A. Yes.

7 Q. More than 20?

8 A. Hmm, I don't know.

9 Q. Where did they take place?

10 A. Um, 7th and Market, when I was in JJC.
11 Yeah, that's all I could remember.

12 Q. When you were at JJC the FBI agents came
13 to see you?

14 A. Yes.

15 Q. How many times?

16 A. Once.

17 Q. And all the other meetings happened at
18 the FBI offices?

19 A. Yes.

20 Q. In the federal building?

21 A. Yes.

22 Q. So there were no other communications
23 between you and Daiquan Davis between the
24 time you were both arrested at the Comfort

1 Inn on November 7th and the time he was
2 arrested at your February 2016 hearing?

3 MR. BEZAR: 15?

4 BY MR. GREENBERG:

5 Q. February 2016?

6 A. 2015.

7 Q. 2016.

8 A. 2015.

9 Q. 2015?

10 A. Yes.

11 Q. Okay.

12 MR. BEZAR: You mean February 18,
13 2015. I think that's the date you've been
14 referring to.

15 MR. GREENBERG: That's correct.

16 THE WITNESS: Yes.

17 MR. GREENBERG: Okay.

18 BY MR. GREENBERG:

19 Q. So let's see. November 7th, 2014, you
20 were both arrested. You wrote him one
21 letter. He wrote you back something that was
22 delivered to you at Vision Quest and then you
23 called him while being transported and you
24 called your mother and you spoke to him on

1 the phone and there were no other
2 communications between the two of you?

3 A. No.

4 Q. No, I'm right?

5 A. Yes, you're right.

6 Q. And since he's been arrested, since he
7 was arrested at your hearing and sent to
8 jail, you never talked to him?

9 A. No.

10 Q. Up to today?

11 A. No.

12 Q. You did see him at his sentencing
13 hearing; correct?

14 A. Yes.

15 Q. But you didn't talk to him?

16 A. No.

17 MR. GREENBERG: I'm going to mark
18 a document EB-2.

19 (Exhibit EB-2 was marked for
20 identification.)

21 BY MR. GREENBERG:

22 Q. Ready to go?

23 A. Yes.

24 Q. Do you have a five-page document that

1 has been marked EB-2? Is that in front of
2 you?

3 A. Yes.

4 Q. Is this document in your handwriting?

5 A. Yes.

6 Q. Would you tell us what this is?

7 A. The letter I wrote to him from Vision
8 Quest.

9 Q. Is this the one you were talking about?

10 A. Yes.

11 Q. What's the date on the letter?

12 A. December 19, 2014.

13 Q. Is this the letter that you thought you
14 sent in November, you actually sent it in
15 December?

16 A. Say that again.

17 Q. When you were telling me about your
18 communications earlier, you said you thought
19 you wrote a letter in November of 2014.

20 A. Oh, yeah.

21 Q. We're now looking at a letter dated
22 December.

23 A. Okay.

24 Q. Is this the letter that you were talking

1 about?

2 A. Yes.

3 Q. Okay. Looking at the first page, the
4 return address has your name at Vision Quest;
5 right?

6 A. Yes.

7 Q. And it's addressed to Quan Davis at 1024
8 Parrish Street, Philadelphia, Pa. 19123.

9 A. Um-hum.

10 Q. Yes?

11 A. Yes.

12 Q. What address is that?

13 A. That's the Ruth Chris Steakhouse
14 address.

15 Q. Are you sure?

16 A. Yeah.

17 Q. All right. Let's go to the first page
18 of the letter, the one that's dated December
19 19, 2014.

20 A. Um-hum.

21 Q. What does it say on the first line on
22 the left?

23 A. "Ride or die."

24 Q. And then "Fu-Fu"?

1 A. Um-hum. That's my nickname.

2 Q. Okay. What does "Ride or die" mean?

3 A. It's a slang term used like I'm going to
4 be there for you like a friend type of thing.

5 Q. Does it mean, is it like a rap term?

6 A. It could be, but not the way I was using
7 it.

8 Q. It is used in rap songs?

9 A. Yes.

10 Q. Does it mean partners in crime, ride or
11 die?

12 A. Yeah.

13 Q. And then the next line says "Shoota
14 Quan."

15 A. Um-hum.

16 Q. What does "Shoota" mean, S-H-O-O-T-A?

17 A. Um --

18 Q. That's a rap term, too, isn't it?

19 A. Yeah.

20 Q. What does it mean?

21 A. Like he would do anything for me
22 basically.

23 Q. It's like your shotgun man, isn't it?

24 A. Yeah.

1 Q. Your right-hand man?

2 A. Yeah.

3 Q. And then "Mood," what does it say

4 "Mood"?

5 A. "Chillin."

6 Q. What does that mean?

7 A. I was chillin. I couldn't do nothing.

8 I was locked up.

9 Q. Okay. What do the next two lines say?

10 A. "Song" and it's just a bunch of songs
11 and artists.

12 Q. A bunch of what?

13 A. Songs and artists.

14 Q. Would you read them to us?

15 A. "Song: MIA, Fantasy, handsome and
16 wealthy and Chiraq, Part 2 on the run."

17 Q. "Part 2 on the run"?

18 A. Um-hum.

19 Q. So why did you write these songs on this
20 line of this letter? What does that mean?

21 A. It basically was telling him I guess the
22 feelings that I have for him.

23 Q. Sorry?

24 A. The feelings that I have for him.

1 Q. And what were they?

2 A. I liked him.

3 Q. You liked?

4 A. Daiquan.

5 Q. And you mentioned these songs conveyed
6 that, that you liked him?

7 A. Yeah, that -- yes.

8 Q. Okay. Do you have to really listen to
9 the words of the songs --

10 A. No.

11 Q. -- to understand why you're putting them
12 in there? No?

13 A. No, no.

14 Q. But you thought he would understand what
15 you were saying because he knows these songs?

16 A. Yeah.

17 Q. Are these songs you and he listened to
18 together?

19 A. No.

20 Q. So how would he know these songs?

21 A. He could just look it up and listen to
22 it.

23 Q. Oh, okay.

24 What's the next line?

1 A. "You better listen to my songs...LOL."

2 Q. I'm sorry?

3 A. "You better listen to my songs...LOL."

4 Q. No, before that. "Artist"?

5 A. Oh, "Omarian, Jhene Aiko, Migos, Meek
6 Mill, Jay-Z and Beyonce."

7 Q. Why are they included here? What does
8 that mean?

9 A. That's the -- okay. So the songs are in
10 order and the artists are in order and who,
11 who the song belongs to.

12 Q. I see.

13 A. Yeah.

14 Q. So who does "Fantasy" belong to?

15 A. Jhene Aiko.

16 Q. And then the next line says "You better"
17 what?

18 A. "Listen to my songs."

19 Q. "LOL"?

20 A. Um-hum.

21 Q. Laughing out loud?

22 A. Yeah.

23 Q. And then there is a face?

24 A. Yeah, it's like a silly face.

1 Q. So what was the meaning of this line,
2 "You better listen to my songs...LOL" with a
3 silly face?

4 A. It was just like making a joke. We
5 didn't listen to the same type of music,
6 so --

7 Q. Would you read the next part of the
8 letter?

9 A. "Tell Sana I love her, but anyway I had
10 court and I'm going to Child First. I'm mad
11 as shyt. I missed my lil sister's b-day, I'm
12 gon miss Christmas and New Years...like what
13 the fuck dawg."

14 Q. Okay. Would you read the next
15 paragraph?

16 A. "But anyway...I miss you too, Quan. We
17 used to have so much fun laughin and shyt.
18 Tell sistah I said hey cuzin CTFU (but real
19 shit)" --

20 Q. Wait. CTFU is what?

21 A. Cracking the fuck up.

22 Q. All right.

23 A. "But real shit I miss you. But they
24 tried to get me to testify against you in

1 court and sign all these papers, but I ain't
2 no rat and I'm holding it down up here like u
3 said u was out there. Them cops grimy, that
4 man was all touchin on me and shyt asking me
5 if u was my boyfriend. I was scared as shyt
6 at the station. We was poppin or whatever."

7 Q. "We was poppin or whatever"?

8 A. Um-hum.

9 Q. That's the end of that paragraph?

10 A. Yes.

11 Q. So you started this paragraph by telling
12 him that you missed him?

13 A. Yes.

14 Q. And that "We used to have so much fun
15 laughin"?

16 A. Um-hum.

17 Q. "Tell sistah I said hey cuzin." Who did
18 you mean by "sistah"?

19 A. Oh, it was a girl. The day before I was
20 arrested, when we were at the Motel 6 and she
21 was there and we kind of got along, and
22 that's what he called her, sistah.

23 Q. Was she a prostitute?

24 A. Yes.

1 Q. Why would he be able to say -- oh, he
2 wasn't in jail when you wrote this letter,
3 was he?

4 A. No.

5 Q. So you assumed he was in touch with her
6 or maybe working with her?

7 A. Yes.

8 Q. Did you think he was still engaged in
9 trafficking at this time?

10 A. Yes.

11 Q. Okay. And you said, "Tell her I said
12 hey cuzin."

13 A. Yeah.

14 Q. That's just a friendly hi to her?

15 A. Yeah, it was like a joke we did, like we
16 was like making our own family.

17 Q. And "CTFU" just means you're laughing?

18 A. Yeah.

19 Q. Another way of saying you're laughing?

20 A. Yes.

21 Q. "But real shyt I miss you." So you told
22 him a second time you really missed him?

23 A. Um-hum.

24 Q. Yes?

1 A. Yes.

2 Q. You then told him that they tried to get
3 you to testify against him in court. Who are
4 you talking about?

5 A. Him.

6 Q. Who was trying to get you to testify
7 against him?

8 A. I had a court date at Child First in
9 Bucks County Youth Center and I refused to
10 testify.

11 Q. Why?

12 A. Because I was scared.

13 Q. You said, "I ain't no rat and I'm
14 holding it down up here like u said u was out
15 there."

16 A. Um-hum.

17 Q. What does that mean?

18 A. Basically like I'm not going to let them
19 break me, they can't get any information out
20 of me, basically that's it.

21 Q. So you were telling him you're going to
22 protect him as long as, and you expect him to
23 protect you?

24 A. No.

1 MR. BEZAR: Objection to form.

2 BY MR. GREENBERG:

3 Q. No?

4 A. No.

5 Q. What did you mean?

6 A. Well, um, I guess what I meant by that
7 would be when he was helping me to make money
8 out there, I mean yeah, basically what you
9 said, like helping each other, you know.

10 Q. You're not going to testify against him
11 and you expect that he won't testify against
12 you?

13 A. No, that wasn't the case of me thinking
14 he wouldn't testify against me. That
15 wasn't -- that wasn't me referring to him
16 testifying against me.

17 Q. It was you saying you won't rat him out?

18 A. Yes.

19 Q. "I'm holding it down up here."

20 A. Um-hum.

21 Q. That meant what?

22 A. Like I'm not giving no information out.

23 Q. Okay. "Them cops grimy, that man was
24 all touchin on me."

1 A. Yeah.

2 Q. When you say "Them cops grimy" what does
3 that mean?

4 A. Like they are not -- they are not --
5 they wasn't doing their job right.

6 Q. "Grimy" is dirty; right?

7 A. Yeah. It can mean plenty of things --

8 Q. Okay.

9 A. -- in the street, street slang.

10 Q. But here how did you mean it, "Them cops
11 grimy"? They were dirty?

12 A. Like dirty cops, like they wasn't doing
13 their job.

14 Q. And when you said "that man was all
15 touchin on me" that's what you're talking
16 about earlier when you said they felt you up?

17 A. Yes.

18 Q. At the time of the arrest?

19 A. Yes.

20 Q. One of the cops did?

21 A. Yes.

22 Q. Which one of the two did that?

23 A. The one that arrested me. When he set
24 the date and knocked on the door and came in,

1 before he pulled his badge out.

2 Q. Officer Crozier?

3 A. Yes.

4 Q. Officer Schwartz was the one that
5 brought Daiquan into the room?

6 A. Daiquan in, yes.

7 Q. "We was poppin or whatever." What does
8 that mean?

9 A. We was getting money together.

10 Q. We were what?

11 A. We was getting money together.

12 Q. Okay. Read the next paragraph, please.

13 A. "But keep ya head up cause the blessings
14 gon be coming soon. When I get to Child
15 First I'm going back to school, gettn a job
16 and driver's license, a car, and I'm gonna be
17 in the independent living program and have my
18 own apartment. So I'm a help you too and
19 maybe you can live with me...LOL (you living
20 with me real shit I don't care what you
21 say)."

22 Q. You kind of trailed off.

23 A. I was too fast?

24 Q. You sort of went down.

1 A. Went down? Okay.

2 Q. Start the paragraph over and keep your
3 voice up. I want to ask you about it after
4 you read it.

5 A. Okay. "But keep ya head up cause the
6 blessings gon be coming soon."

7 Q. Doesn't it say "blessings" -- oh, no,
8 I'm sorry. "Blessings gon be coming soon."
9 I got you. Go ahead.

10 A. "When I get to Child First I'm going
11 back to school, gettn a job, my driver's
12 license, a car, and I'm gonna be in the
13 independent living program and have my own
14 apartment. So I'm a help you too and maybe
15 you can live with me...LOL (you living with
16 me real shit I don't care what you say)...
17 cracking the fuck up."

18 Q. "Real shit" what?

19 MR. BEZAR: You've got to keep
20 your voice up.

21 THE WITNESS: Really?

22 MR. BEZAR: You taper off at the
23 very end.

24 THE WITNESS: "Real shit. I don't

1 care what you say...cracking the fuck up."

2 BY MR. GREENBERG:

3 Q. So what's that paragraph all about?

4 A. Me just being positive, telling him
5 like, you know, don't -- don't give up, um,
6 because he had goals.

7 Q. He had what?

8 A. He had goals that he wanted to
9 accomplish, so that's basically like me, and
10 then I was saying, you know, when I get to
11 Child First, like I said earlier, I'm going
12 to get my life together.

13 Q. And maybe he can come live with you?

14 A. Yeah. That was a joke, though. That's
15 why it's in the thing (indicating).

16 Q. Were you telling him here that you still
17 cared about him?

18 A. Yeah.

19 Q. What's the next page?

20 A. It's just a bunch of hash tags and me
21 asking him to send me pictures of me from my
22 Facebook.

23 Q. The top says "Print pics." Would you
24 read that?

1 A. "Print pics from my Facebook page and
2 send them to me pweeze."

3 Q. What's the next word?

4 A. "Please," but I said "Pweeeze." I was
5 trying to --

6 Q. P-W-E-E-E-Z-E, pweeeze?

7 A. Um-hum.

8 Q. Okay. And then "FB: SourPatch." What's
9 that?

10 A. Facebook -- wait, where. Oh, "Facebook"
11 and then my name, my old Facebook name at the
12 time was SourPatch.

13 Q. You were telling him where he could find
14 your Facebook page?

15 A. Yes.

16 Q. Why did you want him to print pics?

17 A. I wanted pictures of myself.

18 Q. You wanted him to mail them to you at
19 Vision Quest?

20 A. Yes.

21 Q. Why did you want pictures of yourself?

22 A. I don't know. I just wanted to look at
23 the old me, I guess, and you know.

24 Q. All right. The middle of the page has a

1 bunch of things that you called hash tags.

2 A. Um-hum.

3 Q. Could you explain them to me?

4 A. Hash tags is just like basically so you
5 won't have to like write a whole nother
6 paragraph.

7 Q. Okay.

8 A. It's like something like a caption.

9 Q. So what do they mean?

10 A. So like hash tag take a shot for me.
11 I'm arrested, I can't have fun, so he's out
12 in the world, he can have a fun, take a shot
13 for me, like a drink.

14 Q. Got it. What about hash tag P-O-P?

15 A. I forgot what that meant.

16 Q. What about hash tag money baby?

17 A. That was a song. That was a song.

18 Q. What does it mean?

19 A. You just get money. It's just all about
20 the money.

21 Q. About getting money?

22 A. Yeah.

23 Q. Or having money?

24 A. Both.

1 Q. Okay. Why did you put that in here?

2 A. Because that's what we did together, got
3 money.

4 Q. Okay.

5 What's the next one?

6 A. "Hold it down."

7 Q. "Hash tag hold it down"?

8 A. Um-hum.

9 Q. What does that mean?

10 A. Don't break.

11 Q. Don't let the criminal justice system
12 break you down, is that what that means?

13 A. Yes.

14 Q. What's the next one?

15 A. "Hash tag I miss you."

16 Q. Why did you put that in there?

17 A. Because I did. I had feelings for him,
18 yes.

19 Q. Okay. What's the next one?

20 A. "No flex zone. Hash tag no flex zone."

21 Q. What does that mean?

22 A. You never forget where you came from.

23 MR. BEZAR: Keep your voice up,

24

1 BY MR. GREENBERG:

2 Q. What's the next one?

3 A. "Hash tag loud pack." That's just
4 another word for marijuana, good, really good
5 marijuana.

6 Q. "Loud pack"?

7 A. Yes.

8 Q. And what's the next one?

9 A. "Hash tag FTL." It means "fuck the
10 law."

11 Q. Fuck the law?

12 A. Yes.

13 Q. Why did you write that?

14 A. I didn't want to be locked up and I was
15 upset.

16 Q. And then the last one at the bottom?

17 A. Is "Free my black ass."

18 Q. What does that mean?

19 A. Like let me out.

20 Q. Okay.

21 MR. BEZAR: Ed, before, if you're
22 in the middle here, besides from the
23 sentencing hearing information, I notice this
24 records aren't Bates stamped. We have pretty

1 much been circulating Bates stamped records.
2 Am I to assume that that's where these came
3 from and not some other production?

4 MR. GREENBERG: This was an
5 exhibit, Government's Exhibit F.

6 MR. BEZAR: Yes.

7 MR. GREENBERG: To the sentencing
8 memoranda.

9 MR. BEZAR: The sentencing. I
10 wasn't sure if it also happened in, for
11 example, the Vision Quest records or
12 somewhere else, and the reason why I ask that
13 is because all the records we have been
14 circulating are stamped in the lower
15 right-hand corner. This isn't, so this isn't
16 something that we formally exchanged but we
17 have access to. I don't have a problem with
18 that. I'm just asking if it was exchanged at
19 some point.

20 MR. GREENBERG: We got it from
21 the sentencing memorandum. I don't know
22 about exchanging. I'm not sure.

23 MR. BEZAR: Right. Go ahead.

24 MS. MARKS: So it's, to clarify,

1 it wasn't produced, because I think every
2 document that you have produced has been
3 Bates stamped.

4 MR. GREENBERG: That makes sense.

5 MS. MARKS: It was fair to say
6 this was on the docket; correct?

7 MR. GREENBERG: Yes.

8 MS. MARKS: Attached to an exhibit
9 from the sentencing memorandum?

10 MR. GREENBERG: I think that's
11 right. I think we got it from the court.

12 MR. BEZAR: Yes. That's what we
13 just wanted to clarify, that it's not
14 something that's been produced.

15 BY MR. GREENBERG:

16 Q. Let's go to the next page.

17 A. Okay.

18 Q. This says at the upper left, "Page 4 of
19 5," do you see that?

20 A. Yes.

21 Q. That's in your handwriting; right?

22 A. Yes.

23 Q. Okay. Are we missing any pages here?

24 A. No.

1 Q. It looks like we have the whole thing;
2 right?

3 A. Yes.

4 Q. Okay. So here at the top it says "Rida:
5 Fua." That's another reference to ride or
6 die?

7 A. Um-hum.

8 Q. "Shoota Quan," we already talked about
9 that because that was on the first page of
10 the letter; right?

11 A. Yes.

12 Q. And then what's underneath that?

13 A. "Shoota Quan." That's what?

14 Q. No. Beneath that, "Feelin."

15 A. Oh, "Chillin, gettin shit over with."

16 Q. "Gettin shit over with"?

17 A. Um-hum.

18 Q. What does that mean?

19 A. Like just getting my time that I'm doing
20 in placement over with so I can go home.

21 Q. Okay. Then here you have songs and
22 artists again?

23 A. Yes.

24 Q. Are these different ones?

1 A. Yes.

2 Q. What's the significance of these? What
3 do they mean?

4 A. Mi Hitta, it's like known, somebody
5 that's there for you through like the hard
6 times. Hold you down by DJ Khaled. Like I
7 was saying don't break, you know, I'm good,
8 The Weeknd and Lil Wayne, just basically
9 saying like I'm fine, I'm okay.

10 Q. Would you read the next paragraph of the
11 letter?

12 A. "I" -- "I don't really know what to say
13 except...how u been and what happened was
14 crazy. But I'm cool even tho the cops did
15 grimy shit to me. I hope u didn't forget
16 about me tho...I know u out there gettin
17 yours."

18 Q. What does that mean, "I know u out there
19 gettin yours"?

20 A. He's still getting money.

21 Q. Because you believed he was still
22 trafficking?

23 A. Yeah, I knew he was.

24 Q. And is that because you heard it from

1 people?

2 A. No, that's just all he does. That's all
3 he did.

4 Q. Okay. Would you read the next
5 paragraph?

6 A. Yes. "But when I get out I'm going back
7 to school, gettn a job, an apartment, a car,
8 and I'm going to college. Cuz I feel as
9 though if I got caught doing what I was doing
10 I'm not good at it. But we can still be
11 cool, blow some trees, and have a good
12 time...I hope, if that's ok with u."

13 Q. "Blow some trees," what does that mean?

14 A. Smoke weed.

15 Q. Okay. Would you read the next
16 paragraph?

17 A. "Anyway I'm at nut ass Vision Quest just
18 coming from the Youth." The Youth is JJC.
19 That's the slang name for it. "But I'm
20 trying to keep my cool cuz bitches really got
21 attitudes and shit up here like I put em
22 here. But I guess I'm just not used to being
23 with a lot of bitches and I still can't deal
24 with them" -- "deal with them. But I'm a do

1 my time."

2 Eh, I can't really see that. "No"

3 -- oh, no -- I can't understand that part.

4 It's kind of faint.

5 Q. Okay.

6 A. But what I see right here is "not get 30
7 extra days for" -- I don't know. I'm -- I'm
8 pretty sure that would mean like me fighting
9 somebody, that sentence. That's what it
10 looks like.

11 Q. It looks like --

12 A. For --

13 Q. -- "for F-U-C-K."

14 A. That's what it --

15 Q. "Extra days for" --

16 A. Oh, "fucking somebody's child up."

17 MR. BEZAR: Maybe it looks like
18 it says "shit up" --

19 THE WITNESS: Yeah.

20 MR. BEZAR: -- "skin up."

21 THE WITNESS: Yeah, something.

22 MR. GREENBERG: Okay.

23 THE WITNESS: "I got court on
24 December 17th...not that I'm expecting you to

1 come and that wouldn't be a good idea anyway.

2 But I got your back."

3 BY MR. GREENBERG:

4 Q. What does "I got your back" mean?

5 A. Like I won't tell on you.

6 Q. All right. What's the next paragraph on
7 the last page?

8 A. "And fuck all them niggaz that's talking
9 shit cuz when I get out I'm stuntin on
10 er'body and" --

11 Q. What does that mean?

12 A. Like I'm going to do good.

13 Q. You're going to do what?

14 A. Nobody can say like I didn't overcome
15 what I just went through.

16 "Ain't nobody gettin shit from me,
17 not even a word. I'm only gonna be able to
18 call u when I get to Child First cuz the only
19 way" -- "they only let me call my parents.
20 My dad actin corny not pickin up and shyt."

21 Q. What does "corny" mean?

22 A. Like he's not -- like he being weird.

23 Q. He's being weird?

24 A. Yeah. Like it was making me upset

1 basically, like me saying he was being corny.

2 He wasn't picking up my phone call.

3 Q. Okay. Next paragraph?

4 A. "My mind" -- "My mom and you is the only
5 ones that is there for me right now."

6 Q. Next paragraph?

7 A. "But umm...anyway I'm chillin and I
8 can't wait to see you again. Write me back."

9 Q. What does it say after "Write me back"?

10 A. Oh, "ASAP." That means like as soon as
11 possible.

12 Q. Then beneath that?

13 A. It says, "Love U Quan Dog. And thanks
14 for holding me down...Take a shot and smoke a
15 dutch of loud for me tho."

16 Q. "A dutch of loud for me tho"?

17 A. Yes.

18 MR. BEZAR: Your voice tapers
19 off. You have to just keep it up.

20 THE WITNESS: Okay.

21 BY MR. GREENBERG:

22 Q. "Take a shot and smoke a dutch of loud
23 for me tho," what does that mean?

24 A. Take a shot of liquor and smoke some

1 weed for me.

2 Q. And then you signed it?

3 A. Yes, my signature.

4 Q. And you have "XO XO XO"?

5 A. Um-hum.

6 Q. Hugs and kisses?

7 A. Yes.

8 VIDEO SPECIALIST: Going off
9 video record at 2:59. This is the end of
10 tape two.

11 (Discussion held off the record.)

12 VIDEO SPECIALIST: We're back on
13 the video record at 3:05. This is the start
14 of tape three.

15 BY MR. GREENBERG:

16 Q. Ms. [REDACTED] --

17 A. Yes.

18 Q. -- the letter that we just looked at,
19 the December 19, 2014, letter that we marked

20 [REDACTED] 2 --

21 A. Yes.

22 Q. -- is that the only letter you've
23 written to Daiquan Davis from the time you
24 were both arrested at the Comfort Inn to the

1 present time?

2 A. Yes.

3 Q. And is this the letter that you
4 described for us today as the one where you
5 told him that you were moving on with your
6 life, you weren't going to be trafficked
7 anymore and you wanted nothing further to do
8 with him?

9 A. Yes.

10 Q. And that's what you think this letter
11 said?

12 MR. BEZAR: Objection to the
13 form. Let me think for a second here.

14 Go ahead, you can answer.

15 THE WITNESS: In a way.

16 BY MR. GREENBERG:

17 Q. What do you mean "In a way"?

18 A. The type of person he was.

19 Q. I'm sorry?

20 A. The type of person he was. I had to
21 like kind of like work my way around him a
22 little bit because he was like very
23 controlling and manipulating. He was like
24 that. I did care about him. I did have

1 feelings for him. I mean, he was making sure
2 that I, you know, had funds provided to take
3 care of myself, so yes, I did.

4 Q. And it's also true that he gave you
5 marijuana while you were together?

6 A. Yes.

7 Q. Right? I think you told the police how
8 many times?

9 A. Six.

10 Q. Six times, and that was an estimate;
11 right?

12 A. Yes.

13 Q. You also had sex with him several times;
14 correct?

15 A. Yes.

16 Q. How many times?

17 A. I don't know.

18 Q. Did he force you to have sex with him?

19 A. No.

20 Q. You were underage, though?

21 MR. BEZAR: Hold on. She didn't
22 finish her answer.

23 THE WITNESS: He didn't physically
24 force me, but verbally, yes.

1 BY MR. GREENBERG:

2 Q. How?

3 A. Um, he was saying that he need to know
4 if it's good or not and things like that, and
5 I was very uncomfortable. I told him no and
6 he kept like, you know, pressuring, so I just
7 did it.

8 Q. Were you more uncomfortable having sex
9 with him than you were with dates, paid
10 dates?

11 MR. BEZAR: Hold on a second.
12 Let me think about it.

13 I'm not sure I'm going to let her
14 answer that.

15 MR. GREENBERG: It goes to
16 damages.

17 MR. BEZAR: Were you more
18 uncomfortable having sex with him, meaning
19 Daiquan, than you were with dates? You can
20 answer the question.

21 THE WITNESS: In the beginning,
22 yes.

23 BY MR. GREENBERG:

24 Q. You mean the first time?

1 A. Yes, the first couple times I did.

2 Q. Why?

3 A. Because, um, he knew my sister and they
4 had some type of thing going on and I don't
5 involve myself in those type of situations,
6 so it was very -- that was like one of the
7 things that made it very uncomfortable and I
8 guess just the simple fact that I was just
9 giving my body to somebody.

10 Q. So the first couple of times you were
11 uncomfortable and then not?

12 A. Yes.

13 Q. Your DHS case worker made an appointment
14 with you to go to Mr. Davis' sentencing
15 hearing in the federal courtroom.

16 A. Yes.

17 Q. She picked you up and took you there;
18 correct?

19 A. Yes.

20 Q. She sat with you there?

21 A. Yes.

22 Q. Before that date you had been asked to
23 provide a victim impact statement for the
24 sentencing; correct?

1 A. Yes.

2 Q. Did you understand that the victim
3 impact statement would be something that you
4 would sign that would tell the judge how --
5 how much you were harmed by Mr. Davis?

6 A. Yes.

7 Q. And you refused to do that, didn't you?

8 A. I don't remember.

9 Q. You don't remember the federal
10 prosecutors asking you if you would provide a
11 victim impact statement?

12 MR. BEZAR: I think she already
13 said that she was asked to provide a victim
14 impact statement.

15 BY MR. GREENBERG:

16 Q. I thought so, too. So what don't you
17 remember?

18 A. Wait, I'm confused.

19 Q. All right.

20 A. Can you ask what --

21 Q. Let me start over. You do remember that
22 you were asked to provide a victim impact
23 statement; correct? You just said so.

24 MR. BEZAR: Hold on a second. Is

1 it correct or is it just said so? If you
2 want her to answer that part of the question,
3 she will.

4 MR. GREENBERG: I'll rephrase.

5 MR. BEZAR: Thank you.

6 BY MR. GREENBERG:

7 Q. Didn't you just testify that you were
8 asked to provide a victim impact statement
9 for the government to use against Daiquan
10 Davis at his sentencing?

11 MR. BEZAR: Don't answer that.
12 Ask it a different way. You just say did
13 you -- did you just testify so asked and
14 answered. Ask it a different way. Just
15 open-ended ask it.

16 MR. GREENBERG: She already
17 testified to it. I'm trying to go back to
18 it.

19 MR. BEZAR: Then why do you have
20 to ask it again?

21 MR. GREENBERG: Because I'm
22 trying to get to the next question and you
23 keep cutting in.

24 MR. BEZAR: I'm not keep cutting

1 in.

2 MR. GREENBERG: Yes, you are.

3 MR. BEZAR: Just ask another
4 question. Isn't asked and answered --

5 MR. GREENBERG: It --

6 MR. BEZAR: Hold on. Isn't asked
7 and answered and instructing the witness not
8 to answer the question again, isn't that --
9 can't I do that?

10 MR. GREENBERG: Asked and
11 answered is not a good objection either.

12 MR. BEZAR: Okay. You've
13 already --

14 MR. GREENBERG: Let me ask a new
15 question. Okay. If you need to object you
16 will. New question.

17 BY MR. GREENBERG:

18 Q. Did the government prosecuting Daiquan
19 Davis ask you to provide a victim impact
20 statement?

21 MR. BEZAR: Don't answer that.
22 You've already answered it. I'm instructing
23 you not to answer.

24 BY MR. GREENBERG:

1 Q. Did you provide a victim impact
2 statement?

3 MR. BEZAR: She's already
4 answered that as well. Don't answer that.

5 BY MR. GREENBERG:

6 Q. Why didn't you provide a victim impact
7 statement?

8 A. Well, I had my daughter at the time with
9 me there, and to be honest I didn't really
10 want to be seen, like --

11 Q. Well -- go ahead.

12 A. As in the victim impact statement at his
13 prosecution is when the women or the victim
14 just goes up and says what they have to say
15 to that person.

16 Q. It's written down and it's provided in
17 advance of the hearing. It goes to the
18 judge --

19 A. And they --

20 Q. -- before the hearing.

21 A. And they read it, right, out loud, with
22 the person, how the person felt? Yeah, I
23 didn't do that, no.

24 Q. You didn't want to?

1 A. I didn't --

2 MR. BEZAR: Go ahead.

3 THE WITNESS: No, I didn't want
4 to.

5 BY MR. GREENBERG:

6 Q. And reason for that is because you had a
7 child?

8 A. Yes. I didn't want to like be seen.
9 Um, I just, I don't know, I just didn't want
10 to do it.

11 Q. In this letter to Mr. Davis that we just
12 read, the December 19, 2014 letter, you
13 expressed your continued feelings for him;
14 correct?

15 A. Um-hum, yes.

16 Q. Is that one of the reasons why you
17 didn't provide a victim impact statement --

18 A. No.

19 Q. -- against him?

20 A. No.

21 Q. It had nothing to do with it?

22 A. No.

23 Q. At the sentencing hearing were you
24 sitting next to your case worker?

1 A. Yes.

2 Q. Her name was?

3 A. Dawn Thomas.

4 Q. When is the last time you talked to her?

5 A. Last year.

6 Q. Because you're not part of the DHS
7 supervision anymore?

8 A. No.

9 Q. Your case is over?

10 A. Yes.

11 Q. Do you know if she's still at DHS?

12 A. No.

13 Q. She was still there when your case
14 ended?

15 A. I don't know.

16 Q. Okay. Were you listening to the hearing
17 while you were there?

18 A. Yes.

19 Q. Did you hear the judge pro tem announce
20 sentence?

21 A. Yes.

22 Q. What sentence did you hear?

23 A. 22 years and 15 years of supervised
24 probation.

1 Q. After the 22 years?

2 A. Yes.

3 Q. That was your understanding?

4 A. Yes.

5 Q. And did you hear anything about
6 restitution, money to be paid?

7 A. Yes.

8 Q. What did you hear on that?

9 A. I think, um, I don't remember the
10 amount. I didn't really expect any money. I
11 didn't know that -- I didn't know they were
12 going to --

13 Q. Does \$8,000 ring a bell?

14 A. Yeah.

15 Q. You heard that he was going to be
16 ordered to pay you \$8,000?

17 A. Yes.

18 Q. And you told Dawn Thomas that when that
19 money comes you'll put it aside for your
20 children?

21 A. Yes.

22 Q. Has Mr. Davis attempted to contact you
23 since the time he was sentenced?

24 A. Yes.

1 Q. How?

2 A. Um, at this time I was living with Reena
3 Neeley, my foster mother, and I had just
4 delivered my son not too long ago and came
5 home one day and there was a letter from him
6 sitting on my bed.

7 Q. Do you have it?

8 A. No.

9 Q. Where is it?

10 A. Agent Rose has it.

11 Q. What did it say?

12 A. Um, basically he was upset, blaming me
13 for everything. He threatened me. Yeah,
14 that was about it.

15 Q. Was it handwritten?

16 A. Yes.

17 Q. How long was it?

18 A. Like two pages.

19 Q. So your son Zion was born November 23rd,
20 2017?

21 A. Yes.

22 Q. Mr. Davis was sentenced several months
23 before that?

24 A. Yes.

1 Q. And the letter came after November 23rd,
2 2017?

3 A. Yes.

4 Q. So did it come this year in 2018?

5 A. I don't know.

6 Q. Have you had any other communication
7 from him or to him?

8 A. No.

9 Q. Has he sent you any messages through
10 people that you know?

11 A. No.

12 Q. How has the experience of having been
13 trafficked harmed you emotionally?

14 A. I've become very insecure about a lot of
15 things, my body, relationships, how people
16 look at me, how people think about me, yeah,
17 the way I dress. I like to stay covered now.
18 I don't like to really show my body. It was
19 a drastic change.

20 Q. Sorry?

21 A. It was a drastic change.

22 Q. What does that mean?

23 A. Um, just I noticed a lot of things about
24 myself afterwards. I became like more

1 aggressive, moreover protective, paranoid. I
2 don't go outside much, depression.

3 I'm afraid that, you know, if I go
4 outside and go back certain places or
5 somewhere someone will find me or things like
6 that. You know, he knows a lot of people
7 that I know and I'm just afraid all the time
8 when I walk down the street with my kids and
9 incidents happen after he was arrested as
10 well.

11 Q. Such as?

12 A. One day my child's father was spending,
13 having the day with his daughter, our
14 daughter, and he said that someone was just
15 standing there taking pictures of them and
16 then when he noticed they started to run.

17 And I was working at Wendy's last
18 year in May and these random people just like
19 came to the house looking for me and nobody
20 knew them.

21 Q. Any other incidents?

22 A. No.

23 Q. How long did you work at Wendy's?

24 A. May 2018 to June 2018.

1 Q. How many days did you work there?

2 A. I don't remember.

3 Q. Can you give me an estimate?

4 A. 38.

5 Q. 38 days?

6 A. Yeah.

7 Q. This is at one Wendy's location?

8 A. Yes.

9 Q. Where is it?

10 A. Broomall, Pa.

11 Q. How were you coming up with the estimate
12 38 days?

13 MR. BEZAR: You asked her for the
14 estimate, so she gave you the estimate.

15 BY MR. GREENBERG:

16 Q. What's it based on?

17 A. I had called in to quit. I had a family
18 emergency, so I wasn't there.

19 Q. What was the family emergency?

20 A. My child's father was having epileptic
21 episodes.

22 Q. Malik?

23 A. Yes.

24 Q. And that caused you to call in to quit

1 your job?

2 A. Yes. He -- there is nobody there, so I
3 was the only one that was there so, you know.

4 Q. He was living with you then?

5 A. Yes.

6 Q. In May and June of 2018 he was living
7 with you?

8 A. Yes. Not 2018. I didn't mean to say
9 that. I'm sorry. I meant to say 2017 about
10 everything.

11 Q. Wendy's was 2017?

12 A. Yes, yes. I'm sorry.

13 Q. So that's before you made him leave in
14 August of 2017?

15 A. Yes.

16 Q. When you worked at Wendy's, were you
17 paid on the books or off the books?

18 A. What do you mean by that?

19 Q. Were they paying you cash or did they
20 pay you a weekly check based on your exact
21 number of hours?

22 A. Yes.

23 Q. Weekly check?

24 A. Every two weeks.

1 Q. How many checks did you get while you
2 worked there?

3 A. One or two. I don't remember. I don't
4 know.

5 Q. Well, you said you worked there for 38
6 days.

7 A. I don't know. I never -- the checks
8 were transferred to a card that the job --
9 that the place gave us and I never got a
10 chance to activate it or anything, and by the
11 time I did it was over, so --

12 Q. So you never got any of your pay?

13 A. No.

14 Q. No what?

15 A. I didn't get any of my pay.

16 Q. For 38 days of work?

17 A. No.

18 Q. No what?

19 A. No pay.

20 Q. So you said someone came looking for you
21 at Wendy's. How do you know that?

22 A. Not at Wendy's, when I was home, when I
23 came from work. A couple hours later, um, I
24 was in the kitchen cooking and my child's

1 father went to the door and they were asking
2 for me, and like he knows everybody that I
3 know, so he knew for sure that I didn't know
4 them, so he said like no, she doesn't live
5 here, and they just drove off, and he gave me
6 a description of them.

7 Q. But you didn't see them?

8 A. No.

9 Q. And this incident that happened
10 where Malik was with your daughter and his
11 daughter --

12 A. Um-hum.

13 Q. -- you said they were at a playground?

14 A. No.

15 Q. Where were they?

16 A. They were at the 15 bus stop waiting, on
17 their way back to the house.

18 Q. And he told you that he saw someone
19 taking pictures of him?

20 A. Yes.

21 Q. And he noticed it --

22 A. Yes.

23 Q. -- was happening?

24 A. Yes.

1 Q. And when he looked at them they ran off?

2 A. Yes.

3 Q. That's everything you know about it?

4 A. He said it was a girl.

5 Q. You didn't see any of it?

6 A. No.

7 Q. Where does Malik live now?

8 A. I don't know.

9 Q. Does he have a family he can live with
10 if he needs a place to stay, a mother or a
11 father?

12 A. I don't know. I know he has a mother,
13 but I don't know. She doesn't have her own
14 home, so --

15 Q. Where does she live?

16 A. All I know is Southwest Philadelphia.

17 Q. Who does she live with?

18 A. I don't know.

19 Q. Who lives at 5725 Osage Avenue?

20 A. That was their old address. Old
21 address. They don't -- no one no longer
22 resides there.

23 Q. That was his mother's address?

24 A. Yes.

1 Q. Now, about ten or fifteen minutes ago I
2 asked you, tell me how the experience of
3 being trafficked has affected you
4 emotionally.

5 A. Um-hum.

6 Q. You gave me an answer and you mentioned
7 several things. Is there anything more?

8 A. I overelaborate in my mind, over think
9 things, like, like I'm always scared
10 something will go wrong. Now my eating
11 habits changed.

12 Q. How?

13 A. I stopped eating a lot.

14 Q. You started eating a lot?

15 A. I stopped eating a lot.

16 Q. Is that a good thing or a bad thing?

17 A. A bad thing for me.

18 Q. Why?

19 A. Because I don't want to be like -- it's
20 not me. I always been a healthy weight, like
21 I always been like 200 pounds, 190, 180 and
22 like I just lost a bunch of weight.

23 Q. How much do you weigh now?

24 A. 160.

1 Q. How tall are you?

2 A. Five four.

3 Q. You'd rather be 200 pounds?

4 MR. BEZAR: Objection.

5 MR. GREENBERG: I think that's
6 what she's saying. I'm trying to understand
7 it.

8 BY MR. GREENBERG:

9 Q. Is that what you're saying, you'd rather
10 be 200 pounds?

11 A. I'm not saying that. I'm just saying
12 that's -- that's my normal -- my normal
13 weight when I'm health -- my normal healthy
14 weight for me.

15 Q. Is 190 to 200 pounds?

16 A. Yes, usually, yes.

17 Q. So you feel the weight you have now is
18 an unhealthy weight for you?

19 A. Yes.

20 Q. And it's caused by having been
21 trafficked?

22 A. Yes. My eating habit has changed. I
23 don't want to eat barely. Sometimes I would,
24 usually like a couple months ago I would like

1 have to smoke to get a appetite. It would be
2 bad.

3 Q. Have to smoke marijuana to have an
4 appetite?

5 A. Yeah, sometimes.

6 Q. And what about now?

7 A. No.

8 Q. You're not smoking marijuana anymore?

9 A. No.

10 Q. You've given it up?

11 A. Yes.

12 Q. So what are your eating habits now?

13 A. I mean, maybe I'll eat once a day, twice
14 a day.

15 Q. What do you eat?

16 A. Whatever I can, when I get the chance,
17 or if I'm up to it, because I have two
18 children as well, so --

19 Q. Where do you buy food?

20 A. Where do I buy food?

21 Q. Or where do you get food so that you can
22 eat?

23 A. Like market wise or like income?

24 Q. No, no. You told me while you were

1 being trafficked that you ordered in and you
2 went out to McDonald's and you went here and
3 you went there. You told me all that.

4 A. Yeah.

5 Q. So are you still doing that same thing
6 or are you doing something else to eat now?

7 A. No, I just -- I'll just, if I get
8 hungry, I'll just go in the fridge or the
9 freezer, and if I see something, I'll just
10 put it in the microwave or cook it and eat
11 it.

12 Q. Who buys the food for the house?

13 A. Me.

14 Q. Not your mother?

15 A. Both.

16 Q. Okay. So you go to a grocery store and
17 you bring food home?

18 A. Yes.

19 Q. And that's what you eat?

20 A. Yes.

21 Q. Mostly?

22 A. Yes.

23 Q. Are you experiencing any other mental or
24 emotional symptoms that you relate to the

1 experience of being trafficked?

2 A. Dating, dating.

3 Q. Explain that.

4 A. I'm afraid to do it again.

5 Q. When is the last time you dated?

6 A. My child's father.

7 Q. When was that?

8 A. Last year, August.

9 Q. You say you dated him. What do you mean
10 by that?

11 A. That we went out, we were together.

12 Q. You had a relationship together?

13 A. Yeah.

14 Q. And you said that was an abusive
15 relationship?

16 A. Yes.

17 Q. At some point you had a psychological
18 evaluation at the Joseph J. Peters Institute;
19 is that correct?

20 A. Yes.

21 Q. You were sent there by the people that
22 were prosecuting Daiquan Davis?

23 A. Yes.

24 Q. The lawyers that were handling the

1 criminal case; is that correct?

2 A. Yes.

3 Q. There was a Lisa McKie from the
4 Philadelphia District Attorney's Office that
5 was involved in getting you to the Joseph J.
6 Peters Institute?

7 A. Yes.

8 Q. Were there any federal prosecutors or
9 FBI agents involved in that also that you can
10 recall?

11 A. I believe Agent Rose.

12 Q. Agent Rose was?

13 A. Yes.

14 Q. Okay. When you were evaluated there
15 were you questioned about your history and
16 how you were doing, your family life?

17 A. A little, yeah.

18 Q. They questioned you about your
19 relationships?

20 A. Yes.

21 MR. GREENBERG: This is 3.

22 (Exhibit EB-3 was marked for
23 identification.)

24 BY MR. GREENBERG:

Q. I want also to direct your attention to the first page of [REDACTED] Exhibit 3. Let's put it up. You can see in the middle of the page it says "Psychological Evaluation of [REDACTED] [REDACTED], Date of Birth, [REDACTED]" with date of evaluation or dates of evaluation 5/11/2016.

Do you see that?

A. Yes.

Q. Yes?

A. Yes.

Q. The first section of this is a paragraph entitled "Reason for referral and history of presenting problem." Do you see that?

A. Yes.

Q. And it indicates that you were referred there for a comprehensive biosocial -- biopsychosocial evaluation by Ms. Lisa McKie from the District Attorney's Office.

Do you see that?

A. Yes.

Q. And then they mention that you're a witness in a sex trafficking case being prosecuted by the federal government.

Do you see that?

A. Yes.

Q. All right. Let's go to the next page.
And I'd like to go down to -- well, at the
top it says "Individual's account of abuse."
Do you see that? And it says, "During
today's evaluation Ms. [REDACTED]
reported that she was referred from the
District Attorney's Office, quote, because I
was involved in human trafficking, close
quote."

Do you see that?

A. Yes.

Q. I want to go down to the paragraph, the
third paragraph on the page. It starts,
"Ms. [REDACTED] further noted." I'm going
to read that to you. Please follow along
with me.

A. Yes.

Q. "Ms. [REDACTED] further noted that she
experienced intimate partner violence from
her ex-pimp that primarily included physical
abuse as well as emotional abuse. She added
that she currently has a restraining order

1 against her ex-pimp, however, due to his
2 identification as the father of her unborn
3 child, the judge who granted the restraining
4 order is reportedly allowing him to attend
5 prenatal visits and to communicate with
6 Ms. [REDACTED] to discuss the unborn child.
7 Ms. [REDACTED] reported that this is
8 difficult for her and triggering when he is
9 allowed to be in the room during her prenatal
10 visits."

11 Did you follow me through that?

12 A. Yes.

13 Q. Is it true that Malik showed up at your
14 prenatal visits before your daughter was
15 born?

16 A. Yes.

17 Q. And that was stressful for you?

18 A. A little.

19 Q. When the judge gave you the protection
20 from abuse order, was it a male or a female
21 judge, do you know?

22 A. Female.

23 Q. Was it Judge Dumas?

24 A. Yes.

1 Q. And did she order that he could attend
2 these prenatal visits?

3 A. No. The PFA judge ordered it.

4 Q. Oh, that was a different judge?

5 A. Yes.

6 Q. Were you there for a hearing in front of
7 that judge?

8 A. Yes.

9 Q. Do you know who that was?

10 A. No.

11 Q. Okay. And you told these people at
12 Joseph J. Peters Institute that Malik was
13 your ex-pimp?

14 A. No.

15 Q. You didn't tell them that?

16 A. No.

17 Q. So this is wrong, this report?

18 A. Yes.

19 Q. Let's go back to the first page. The
20 reason for referral and history. In the
21 middle of the paragraph it says, "The
22 referral note further indicates that
23 Ms. [REDACTED] is currently pregnant by her
24 ex-pimp who was reportedly physically

1 violence," so I want to ask you about this.

2 At the time of this evaluation you
3 were pregnant; correct?

4 A. Yes.

5 Q. And you were pregnant with your
6 daughter?

7 A. Yes.

8 Q. Who was born about six or seven months
9 later, six and a half months later?

10 A. Um-hum.

11 Q. Right?

12 A. Yes.

13 Q. And Malik is her father?

14 A. Yes.

15 Q. And he was abusive?

16 A. Yes.

17 Q. Physically violent?

18 A. Yes.

19 Q. So the only part of this sentence that
20 you're saying is wrong is that Malik was your
21 ex-pimp?

22 A. Yes.

23 Q. You never said that?

24 A. No, I never said that.

1 Q. Has Malik ever engaged in pimping or
2 prostitution to your knowledge?

3 A. No.

4 Q. And you and Malik never worked together
5 as pimp and prostitute?

6 A. No.

7 Q. Has Malik ever been incarcerated?

8 A. Yes.

9 Q. For what?

10 A. I don't remember.

11 Q. Did you ever know?

12 A. Know what?

13 Q. Did you know at one time? You're saying
14 you don't remember. Did you -- did you know
15 at some time --

16 A. At one point in time I did, but I don't
17 remember now. I don't. It's been a while.

18 Q. When did you forget?

19 A. I don't know. I haven't talked to him
20 in like over a year.

21 Q. How long has he been incarcerated?

22 MR. BEZAR: How long is he or was
23 he?

24 BY MR. GREENBERG:

1 Q. How long was he incarcerated?

2 A. I don't know.

3 Q. How many times was he incarcerated?

4 A. I don't know.

5 Q. Where was he incarcerated?

6 A. I don't know.

7 Q. Were you ever with him when he was
8 arrested?

9 A. Once.

10 Q. Where did that happen?

11 A. I was in Northern Child Services and he
12 got into a fight with his family.

13 Q. With who?

14 A. His family.

15 Q. So were you there or you were in a
16 relationship with him when that happened?

17 A. Yes.

18 Q. That's what you mean you were with him?

19 A. Yes, but I wasn't physically there when
20 it happened, but we were in a relationship at
21 the time.

22 Q. So you know without being there, you
23 know he was arrested and put in jail for
24 that --

1 A. Um-hum. Yes.

2 Q. -- event?

3 A. Yes.

4 Q. Do you know how long he stayed in jail
5 for that?

6 A. 30 days.

7 Q. Where was he in jail?

8 A. I don't remember.

9 Q. Okay. Was he incarcerated at any time
10 before you started your relationship with
11 him?

12 A. Yes.

13 Q. When?

14 A. I don't remember.

15 Q. Do you know how long before it was
16 before you got involved with him?

17 A. No.

18 Q. You said you met him when you were 15, I
19 think?

20 A. Yes.

21 Q. Was it after that?

22 A. I don't know.

23 Q. Do you know if he's been in any legal
24 trouble, criminal legal trouble since you

1 kicked him out of your home in August of
2 2017?

3 A. No.

4 Q. You don't know?

5 A. No.

6 Q. When did you find an attorney for this
7 case that you have here?

8 A. The human trafficking?

9 Q. Yes.

10 A. I didn't find one. I was assigned one.

11 Q. Who assigned you?

12 A. Family court. You automatically have a
13 public defender.

14 Q. But you have Kline & Specter
15 representing you in this case.

16 A. Oh, um, ask the question again.

17 Q. When did you get your attorney for this
18 case?

19 A. Last year, I believe March, I think it
20 was March or April.

21 Q. Of 2017?

22 A. '18. Oh, sorry, 2017, yes. It was like
23 April, May.

24 Q. Did somebody refer you to your attorney?

1 A. I don't remember.

2 Q. Well, who is the first attorney you
3 talked to about a civil case?

4 MS. MARKS: Objection.

5 THE WITNESS: What's the question
6 again?

7 BY MR. GREENBERG:

8 Q. Who was the first attorney you talked to
9 to handle your civil case?

10 A. I don't remember.

11 Q. Have your attorneys sent you anywhere
12 for treatment?

13 MS. MARKS: Objection.

14 THE WITNESS: I can answer?

15 MS. MARKS: You can answer.

16 THE WITNESS: Oh, have they what?

17 BY MR. GREENBERG:

18 Q. Have they sent you anywhere for
19 treatment?

20 A. No.

21 Q. Are you getting any treatment?

22 A. Not right now, no.

23 Q. When have you had treatment for, for the
24 suffering that is the result of the

1 trafficking?

2 A. The JJPI and I was -- I was referred to
3 someone but I had my son.

4 Q. You were what?

5 A. I was supposed to go to I think it's
6 called The Bridge, but I end up having my son
7 before that so --

8 Q. Who made arrangements for you to go to
9 The Bridge? Was that DHS?

10 A. Yes.

11 Q. Have you had any psychological or
12 psychiatric counseling or care?

13 A. A few times this year, yes.

14 Q. Where?

15 A. The Net.

16 Q. Where is that?

17 A. On 5th and Spring Garden. You can just
18 walk in. It's -- it's like a therapy place.
19 They have different resources. You can go
20 there and talk to somebody. They'll, you
21 know, schedule you for a therapist that will
22 be your ongoing therapist for however long
23 you are going to the building.

24 Q. Do you know who you saw there?

1 A. I believe her name was Barbara.

2 Q. Barbara what?

3 A. I don't remember her last name.

4 Q. Is she a medical doctor or something
5 else?

6 A. I don't know. I believe she's a
7 therapist.

8 Q. Other than what you've already told me,
9 have you received any other care for the
10 emotional injuries you suffered in the human
11 trafficking?

12 A. No.

13 Q. Do you have any plans to get any
14 treatment?

15 A. Yes.

16 Q. What are your plans?

17 A. Um, well, once I get my kids into day
18 care I'll have more time and then I'll be
19 able to receive therapy.

20 MR. BEZAR: Try to keep your
21 voice up.

22 BY MR. GREENBERG:

23 Q. Right now you don't have time?

24 A. Yeah. No, I don't.

1 Q. When do you expect to have your kids in
2 day care?

3 A. Less than 30 days.

4 Q. And what problems are you hoping to get
5 help with?

6 A. Being happy, feeling like myself, being
7 comfortable in my own skin, just feeling like
8 a woman, not a piece of trash.

9 Q. Anything else?

10 A. No.

11 Q. What have you done to prepare for your
12 deposition in this case? Have you had
13 meetings?

14 A. Yes, one.

15 Q. One meeting?

16 A. Yes.

17 Q. When was it?

18 MR. BEZAR: Meetings with
19 counsel?

20 MR. GREENBERG: Yes.

21 MR. BEZAR: Yeah, we're not going
22 to talk about the number of meetings she had
23 with counsel.

24 MR. GREENBERG: Why not?

1 MR. BEZAR: Because we're not
2 going to talk about that.

3 MR. GREENBERG: What's the basis
4 of the objection?

5 MR. BEZAR: That's between my
6 client and myself.

7 MR. GREENBERG: The substance of
8 the meetings.

9 MR. BEZAR: And the number of the
10 meeting we're not going to --

11 MR. GREENBERG: The number is?

12 MR. BEZAR: Yes.

13 MR. GREENBERG: That's
14 privileged?

15 MR. BEZAR: If you want to file
16 your motion, file your motion. You have been
17 schooling me on what's allowed to happen in a
18 deposition all day, so I will be impressed.

19 MR. GREENBERG: You're
20 instructing her not to answer? Okay.

21 MR. BEZAR: The number of meetings
22 or how many meetings.

23 BY MR. GREENBERG:

24 Q. When was the meeting?

1 MR. BEZAR: You're got going to
2 answer that. You're not going to answer
3 that.

4 BY MR. GREENBERG:

5 Q. Who was present at the meeting?

6 MR. BEZAR: You're not going to
7 answer that.

8 BY MR. GREENBERG:

9 Q. Was anyone other than your lawyer
10 present at the meeting?

11 MR. BEZAR: The answer is no and
12 you're not going to answer it.

13 MR. GREENBERG: I'm not asking
14 you, Mr. Bezar.

15 MR. BEZAR: Well, she's not going
16 to answer it.

17 MR. GREENBERG: The question is
18 fine. You're trying to claim a privilege and
19 I'm not allowed to ask her if anybody else
20 was present at the meeting? You're answering
21 that?

22 BY MR. GREENBERG:

23 Q. Who is Paul Brana?

24 A. I don't know.

1 Q. Have you ever heard of him?

2 A. I heard of the name before, but I don't
3 know who exactly that is.

4 Q. You never met him?

5 A. No.

6 Q. You've never been to his home?

7 A. No.

8 Q. Did you tell the police at the time of
9 your arrest or shortly after your arrest that
10 Mr. Davis had a gun with him when you and he
11 were at the Comfort Inn?

12 A. Yes.

13 Q. Do you know why they didn't find that
14 gun?

15 A. No.

16 Q. Did Mr. Davis ever tell you what he did
17 with the gun?

18 A. He just said it was for protection.

19 Q. But did he ever tell you how he
20 prevented the police from finding the gun at
21 the time of his arrest?

22 A. No.

23 (Exhibit EB-4 was marked for
24 identification.)

1 MR. BEZAR: EB-4, is that what
2 we're on?

3 MR. GREENBERG: Yes.

4 BY MR. GREENBERG:

5 Q. Ms. [REDACTED] do you have EB-4 in front of
6 you?

7 A. Yes.

8 Q. This document which is 30 pages came
9 from the Y-HEP Health Center which says,
10 which also has below the name the words a
11 "Philadelphia FIGHT Community Health Center."

12 Do you see that?

13 A. Yes.

14 Q. And a few pages in there is an address
15 on Locust Street. Are you familiar with
16 this --

17 A. Yes.

18 Q. -- place? Is it a clinic where you can
19 go to get free care?

20 A. Yes.

21 Q. I'd like to you go to the page --

22 MR. BEZAR: Can we -- can we go
23 off? We can stay on the video record or go
24 off the video. It doesn't matter. It's a

1 quick question.

2 Ed, if you look, it looks like it
3 says page, for example, on Y-HEP 4 it's Bates
4 stamped, it says Page 1 of 53. Then you turn
5 the page and it's 3 of 53. And I'm not
6 suggesting there is pages missing, but it
7 just seems like there are an odd number of
8 pages, and if there is only 30 pages of
9 Y-HEP, there is 53 pages here, so do you want
10 to just take a moment and see that we have
11 the whole document or am I just misreading
12 it?

13 MR. GREENBERG: This is exactly
14 how it came from your office.

15 MR. BEZAR: Okay.

16 MS. MARKS: And that's how we
17 received it.

18 MR. GREENBERG: That's what I
19 assume.

20 MR. BEZAR: Fair enough.

21 MR. GREENBERG: I can only use
22 what I have.

23 MR. BEZAR: No, I didn't mean to
24 suggest anything. I wasn't sure if they were

1 copied in the interim.

2 MR. GREENBERG: I fully
3 understand that there are missing pages.
4 This is not the only document that we've
5 received in this manner.

6 BY MR. GREENBERG:

7 Q. Would you turn to page Y-HEP 9? Do you
8 see there is a section here on the progress
9 note called "History of present illness"?

10 A. Uh-huh.

11 Q. Yes?

12 A. Yes.

13 Q. At the top it says "Visit date October
14 27, 2014." Do you see that?

15 A. Where at?

16 Q. Upper right, visit date, October 27,
17 2014.

18 A. Oh, I see it, yeah.

19 Q. Okay. Location address 1417 Locust
20 Street, Third Floor.

21 A. Um-hum.

22 Q. The address seems to be close to Broad
23 Street. It would be just west of Broad
24 Street.

1 A. Um-hum.

2 Q. Have you been there?

3 A. Yes.

4 Q. Okay. It appears your chief complaint
5 was you wanted STI testing and birth control.
6 Do you see that?

7 A. Yes.

8 Q. And then under history of present
9 illness it says you were below the age of 18,
10 you were exclusively receiving treatment for
11 sexual and reproductive health services
12 except abortion. Do you see that?

13 A. Yes.

14 Q. It says you were otherwise doing well
15 and you have no other complaints. Do you see
16 that?

17 A. Yes.

18 Q. "The patient's LMP was July 2014." I
19 think that means last menstrual period.

20 A. Yes.

21 Q. "She is currently on no contraception.
22 Her menses are regular since stopping Depo in
23 July 2014." Depo is some kind of birth
24 control?

1 A. Yes.

2 Q. Is that what you were taking?

3 A. Yes.

4 Q. It says you have a certain condition.

5 I'm not even going to get into it right now.

6 You reported your last HIV test was September

7 9, 2014. "In terms of sexual orientation,

8 she prefers men while engaged in sexual

9 intercourse. She prefers oral sex and

10 vaginal sex. The patient is dating and feels

11 safe in relationships. She denies being

12 forced to have sex against her will. The

13 patient states she does not intend pregnancy

14 in the future. She states she desires to

15 start a contraceptive."

16 Do you see all that?

17 A. Yes.

18 Q. Now, this -- this visit happened during

19 the time when you claim you were being

20 trafficked?

21 A. Um-hum.

22 Q. Correct?

23 A. Yes.

24 Q. And you went into this clinic and you

1 denied having been forced to have sex against
2 your will?

3 A. Yes.

4 Q. Correct?

5 A. Yes.

6 Q. Was that a true statement?

7 A. What do you mean by that? Like did I
8 mean it when I said it?

9 Q. Was it true when you told them that?

10 A. No.

11 Q. How was it untrue?

12 A. Because I was being forced.

13 Q. By?

14 A. Daiquan.

15 MR. GREENBERG: You can take that
16 down.

17 MS. O'CONNELL: I'm sorry. Did
18 somebody say something? I missed it.

19 MR. BEZAR: I think Ed just said
20 you can take that down.

21 MR. GREENBERG: I was talking to
22 Brian Sack.

23 MS. O'CONNELL: Oh, okay.

24 BY MR. GREENBERG:

1 Q. Did any of the prosecutors handling
2 Daiquan Davis' criminal case ever offer you
3 any kind of a deal in exchange for your
4 cooperation in his prosecution?

5 A. No.

6 MR. BEZAR: That's a great
7 question. I thought of a bunch of questions.
8 That's not one I thought of.

9 MR. GREENBERG: I think so as not
10 to waste time, while I'm reviewing my notes
11 I'm going to pass the witness over to you,
12 Ms. O'Connell.

13 MS. O'CONNELL: You're finished?

14 MR. GREENBERG: Well, I'm close
15 to finished. I'm looking at my notes, but I
16 don't want to waste time, so why don't you go
17 ahead.

18 MR. BEZAR: Is now a good time to
19 take a break then?

20 MS. O'CONNELL: Yeah, that would
21 be good.

22 VIDEO SPECIALIST: Going off the
23 record at 3:57.

24 (Discussion held off the record.)

(Exhibit EB-5 was marked for
identification.)

VIDEO SPECIALIST: We're back on
the video record at 4:06.

BY MR. GREENBERG:

Q. Miss [REDACTED] do you have EB-5 on the table
in front of you?

A. Yes.

Q. That's the defendant's sentencing
memorandum in the United States of America
versus Daiquan Davis?

A. Yes.

Q. Yes?

A. Yes.

Q. I'd like to show you some of the photos
in here and ask you some questions about
them. The first one I want to ask you about
is this one. Rather than flip through, we'll
put it up on the screen. Can you tell me who
is shown in this photograph?

A. Daiquan.

Q. Who is he with?

A. I don't know.

Q. You don't recognize the female?

1 A. No.

2 Q. Could you keep your voice up, please?

3 A. Yes.

4 Q. Is that pretty much how he looked when
5 he was trafficking you?

6 A. Yes.

7 Q. He's about 21 years old in that picture
8 you would say?

9 A. Yes.

10 MR. BEZAR: What page number was
11 that in the package we just --

12 MR. GREENBERG: It's not
13 numbered. It's right here (indicating).

14 MR. BEZAR: All right. I'm
15 sorry.

16 MR. GREENBERG: Do you have it?

17 MR. BEZAR: I have it, yep.

18 Thank you.

19 MR. GREENBERG: Okay. Could you
20 mark this?

21 (Exhibit EB-6 was marked for
22 identification.)

23 BY MR. GREENBERG:

24 Q. Miss [REDACTED] do you have this photograph in

1 front of you?

2 A. Yes.

3 Q. Could you tell us who is shown in this
4 photograph?

5 A. My daughter and child's father.

6 Q. That's Malik?

7 A. Yes.

8 Q. Was this taken when your daughter was
9 about nine months old would you say?

10 A. Yes.

11 Q. She was standing up at that point?

12 A. Walking.

13 Q. She was walking at nine months?

14 A. Yes.

15 Q. Where was this picture taken?

16 A. In the Liberty Place.

17 Q. Liberty Place?

18 A. Yeah, downtown.

19 Q. The shopping center?

20 A. Yes.

21 Q. Okay. Were you there with both of them?

22 A. I took the picture, yes.

23 Q. When was the picture taken? Oh, it was
24 when she was nine months old, so we can

1 figure that out. She was born in --

2 A. September.

3 MR. BEZAR: Let him ask a
4 question.

5 BY MR. GREENBERG:

6 Q. It was taken around September 20 --

7 A. 2017.

8 Q. 2017?

9 A. Yes.

10 Q. That's after you had kicked him out of
11 your home?

12 A. Oh, yes.

13 Q. So you met him at the mall after you
14 made him leave the home?

15 A. Yes.

16 Q. Is this so he could see your daughter?

17 A. Yes.

18 Q. When you were being trafficked and
19 Mr. Davis was leaving you alone for long
20 periods of time working at the restaurant
21 five days a week, why didn't you leave and
22 try to seek help?

23 A. Because I wasn't getting any help where
24 I was at. Whenever I needed help they would

1 lie to me.

2 Q. Sorry? Who lied to you?

3 A. I would never receive help.

4 Q. From who?

5 A. If I was to return myself to DHS, they
6 would just put me back in placement. They
7 would never try to help me.

8 Q. And you didn't want to be put back in
9 placement?

10 A. No.

11 Q. You didn't want to go back to the Villa?

12 A. No, because they lied to me.

13 Q. Lied to you how?

14 A. About going home.

15 Q. They kept you at the Villa when they
16 told you you would get to go home?

17 A. Yes.

18 Q. Okay. Any other reason?

19 A. And my aunt, I had a family emergency as
20 well. Okay. Are you referring to --

21 Q. Any reason why you didn't try to get out
22 of trafficking besides the fact that you
23 didn't want to go back to a DHS placement?
24 Is there any other reason?

1 A. Yeah. I mean, I needed somewhere to
2 stay. I needed to eat. I needed to put
3 clothes on my back, be able to get around.

4 Q. You felt you had no choices?

5 A. Yes.

6 Q. When you were checking into the Motel 6
7 and you were sitting in the lobby, how did
8 you behave?

9 A. Just sat there.

10 Q. Nonchalant, kept to yourself?

11 A. Yes.

12 Q. You tried not to be noticed?

13 A. No.

14 Q. Just regular, just sat there?

15 A. Yes.

16 Q. Doing nothing?

17 A. Yes.

18 Q. Waiting?

19 A. Yes.

20 MR. GREENBERG: That's all I
21 have.

22 VIDEO SPECIALIST: We're going
23 off the video record at 4:12.

24 (Discussion held off the record.)

1 VIDEO SPECIALIST: We're back on
2 the video record at 4:14.

3 BY MS. O'CONNELL:

4 Q. Ms. [REDACTED] good afternoon.

5 A. Good afternoon.

6 Q. My name is Penny O'Connell. I have
7 fewer questions than Mr. Greenberg did, but
8 hopefully you'll hang in with us a little bit
9 longer and we'll get you out of here today.

10 I'm here for Neshaminy Inn.

11 A. Okay.

12 Q. How are you feeling today? As you sit
13 here with us today how do you feel?

14 A. Mixed emotions.

15 Q. Like what? Tell me about them.

16 A. Um, kind of hard to talk about this, but
17 at the same time I want some closure and some
18 happiness, some peace.

19 Q. How do you hope to achieve those things?

20 A. Therapy, seeking help, yeah. That's
21 about it.

22 Q. Do you have -- what's your support
23 structure like now in terms of family and
24 friends? Who is around to give you a hand

1 emotionally, with the kids?

2 A. I would say that my mom.

3 Q. You rely on your mom a lot?

4 A. Yes.

5 Q. Do your kids live with you at your
6 mom's?

7 A. Yes.

8 Q. I know you were already asked are you on
9 any medications today and your answer was no.
10 Are you on any prescribed medications that
11 you take on a regular basis?

12 A. No, just an Albuterol pump for asthma.

13 Q. When is the last time you recall taking
14 a prescribed medication for something other
15 than asthma?

16 A. When I was pregnant, taking prenatal
17 pills.

18 Q. Have you ever taken, to your knowledge,
19 anything for depression or anxiety?

20 A. Yes.

21 Q. When was that?

22 A. That was as a child.

23 Q. When is the last time you think you were
24 prescribed something for depression or

1 anxiety?

2 A. I was 13.

3 Q. Do you recall, was there an incident in
4 particular that prompted a prescription for
5 depression or anxiety?

6 A. I wouldn't say depression, but more
7 anxiety and things like that. Ask the
8 question one more time.

9 Q. Was there something in particular that
10 happened in your life that prompted, that
11 made a doctor write a prescription for you
12 for anxiety medication?

13 A. I was being molested.

14 Q. By who?

15 A. My mom's ex-boyfriend.

16 Q. Is that Mr. Threats?

17 A. Yes.

18 Q. I think I saw in the records, and
19 correct me if I'm wrong, there are a lot of
20 records, and I'm not going to use them all as
21 exhibits, but I think I saw a reference to
22 Mr. Threats being your mom's pimp at one
23 point. Is that right or am I wrong?

24 A. Are you asking me if that's correct?

1 Q. Yes. Is that correct?

2 A. Well, I don't know.

3 Q. Okay. So you're not aware that your mom
4 was ever a prostitute to your knowledge?

5 A. Oh, no.

6 Q. Okay. It might have been a mistaken
7 record or I might be mistaken.

8 MR. BEZAR: Can you ask that
9 question so she's answering the question?

10 MS. O'CONNELL: Sure, absolutely.

11 BY MS. O'CONNELL:

12 Q. Do you have any knowledge of your mom
13 ever having had sex for money?

14 A. No.

15 Q. Just a little bit more about your
16 younger years. I know you're still very
17 young, but going back a little bit, so I ask
18 you to reach back in your memory banks here,
19 you mentioned your work at Wendy's. It
20 didn't last very long. How did you get that
21 job?

22 A. Snagajob.com.

23 Q. Have you had any other employment other
24 than Wendy's?

1 A. No.

2 Q. That was your only job where you --

3 A. Oh, no.

4 Q. Oh, go ahead.

5 A. It's a gas and electric company called
6 Major Energy. I worked for them as well.

7 Q. How long did you work there?

8 A. A few days.

9 Q. Did you -- did you just not like holding
10 down a job?

11 A. No. I quit that job, Major Energy,
12 because they had bedbugs in the company van,
13 so yeah, and then with Wendy's there was no
14 issue. I was -- I was a good worker, just
15 the circumstances with my baby father's
16 family, no one was there, because he couldn't
17 speak for his self when he was in the
18 hospital, so I was the only one that was like
19 really supporting him during that time, so I
20 didn't have no choice but to be there for
21 him, so I had quit.

22 Q. What is your source of income now?

23 A. I receive cash benefits from the state.

24 Q. Is that like EBT?

1 A. Yes.

2 Q. And you get those for your kids as well
3 as for yourself?

4 A. Yes.

5 Q. You're probably on like WIC, is that --

6 A. Yeah, WIC as well, yes.

7 Q. How much, can you estimate how much a
8 month you get from these social programs?

9 A. Food stamps, 511. Cash, I would say
10 400.

11 Q. Any other sources of income, Social
12 Security, disability, anything like that?

13 A. No.

14 Q. Have you ever been diagnosed with PTSD?
15 Do you know what that is?

16 A. Posttraumatic stress disorder. Yes, I
17 have.

18 Q. How old were you when you were diagnosed
19 with PTSD?

20 A. After I was 17.

21 Q. Have you ever tried to seek any sort of
22 disability benefits or anything?

23 A. No.

24 Q. So other than food stamps and cash, any

1 other sources of income that we haven't
2 talked about?

3 A. No.

4 Q. Do you help your mom with rent?

5 A. No.

6 Q. She covers that?

7 A. Yes.

8 Q. How about utilities?

9 A. No.

10 Q. She covers that?

11 A. Yes.

12 Q. Did you end up graduating high school at
13 any point?

14 A. Yes.

15 Q. What year was that?

16 A. 2016.

17 Q. Was that a GED program?

18 A. No, high school diploma.

19 Q. What high school did you graduate from?

20 A. It's a -- it's a -- it's complicated.

21 It was in Vision Quest and it's an online
22 course called PLATO Courseware.

23 Q. All right. So it's as if you were in a
24 classroom in a high school, you just did it

1 online?

2 A. Yes.

3 Q. How were your grades when you graduated
4 high school?

5 A. They was pretty decent depending on what
6 subject it was, you know.

7 Q. Do you -- are you currently enrolled in
8 any college programs?

9 A. No. I'm enrolling myself now.

10 Q. You're in the process of enrolling?

11 A. Yes.

12 Q. Where are you enrolling?

13 A. CCP or Strayer University.

14 Q. What do you want to study?

15 A. Psychology, social work, business, and
16 to be a doctor or a nurse.

17 Q. Why are you choosing those areas?

18 A. I want to do social work because of the
19 things that I've experienced and I want women
20 to know that they could be heard and that
21 they matter and that they can receive
22 justice, and I want to do psychology because
23 I want to, you know, be able to talk to them
24 on a level. I want to do business because I

1 want to have shelters for human trafficking
2 women or homeless women. I want to do, you
3 know, I want to help women, you know.

4 Q. You mentioned, we've actually used the
5 word "trafficking" a lot today. Where did
6 you learn that word?

7 A. Human trafficking?

8 Q. Yes.

9 A. After I was detained.

10 Q. After you were detained November 7th,
11 2014?

12 A. Yes.

13 Q. Who was the first person to use that
14 word, if you can recall?

15 A. My judge.

16 Q. Do you remember the context? Do you
17 remember how it was said, that word
18 "trafficking"?

19 A. No.

20 Q. Up until the point when the judge said
21 "trafficking," what did you call it?

22 A. Prostitution, whore, slut.

23 MR. GREENBERG: I didn't hear the
24 whole answer. Your voice trailed off.

1 THE WITNESS: Prostitution, whore,
2 slut.

3 BY MS. O'CONNELL:

4 Q. You, I think you told us you were
5 involved in sex for money for it was
6 basically the fall of 2014; is that right?

7 A. Yes.

8 Q. October, November? That's pretty much
9 it, October, November?

10 A. Yes.

11 Q. So two months?

12 A. Yes.

13 Q. In that two-month period were you ever
14 in a room with a trick, with a john, with
15 another woman?

16 A. Yes.

17 Q. Okay. So was that sort of like the
18 twofer or a guy would request two women?

19 A. Yes.

20 Q. To your knowledge were these women also
21 underage or of age? Do you know?

22 A. I only met one woman and she was of age.
23 She was over 18.

24 Q. What was her name?

1 A. Shiquanda.

2 Q. And she is the only one you recall
3 meeting?

4 A. Yes, that's the only one, yes.

5 Q. What hotel or motel were you at when I
6 met Shiquanda?

7 A. Motel 6.

8 Q. Did you meet Shiquanda only once or more
9 than once?

10 A. Once.

11 Q. Did any of the johns ask you how old you
12 were?

13 A. No.

14 Q. How did -- did Daiquan Davis ever ask
15 you how old you were?

16 A. He didn't care. I don't even think he
17 ever asked.

18 Q. Did he know?

19 A. Yes, I believe he did know I was 17.

20 Q. How did he know?

21 A. My sister. She had to tell him.

22 Q. Do you know whether she told him or not?

23 A. I'm -- no, I don't.

24 Q. You don't. You're assuming she told him

1 that you were 17?

2 A. Yeah.

3 Q. You yourself never told him?

4 A. Yes, I did.

5 Q. You did tell him?

6 A. Yes.

7 Q. When did you tell him?

8 A. When we were -- we were at Sana's house
9 the first night that I started.

10 Q. All right. That was the time when you
11 had the car conversation --

12 A. Yes.

13 Q. -- for a hundred dollars?

14 A. Yes.

15 Q. And he asked you -- did he ask you how
16 old are you or did you volunteer and tell him
17 how old you were?

18 A. I told him.

19 Q. Why did you tell him?

20 A. I don't know. I guess to, for him to
21 know that I'm not an adult and that I'm a
22 minor.

23 Q. What -- what did that mean to you? What
24 could happen if you were not of age sitting

1 in a car with a man? To you what did it mean
2 to be 17 versus 18?

3 A. More freedom, I guess. You have more
4 advantages. You can do more things, more
5 privileges.

6 Q. Did you think that you could get in
7 trouble for being 17 getting paid to talk
8 with a man in a car?

9 A. No.

10 Q. Did you think that you could get in
11 trouble at 17 for getting money for having
12 sex with a man?

13 A. Yes.

14 Q. Did you think you could get in trouble
15 at age 18 for having sex with a man for
16 money?

17 A. No.

18 Q. You didn't think it was a crime to have
19 sex for money as --

20 A. I did, but at that age, no. At that
21 time, no, I didn't think that if I'm 18 I
22 won't get in trouble.

23 Q. Just to clarify for the record, when you
24 were having sex for money, did you think that

1 if you got caught you would not get in
2 trouble if you were 18 years old?

3 A. Yes.

4 Q. And you thought you could get in trouble
5 if you were 17 years old?

6 A. Yes.

7 Q. So to your understanding, having sex for
8 money was not illegal if you were 18 and
9 over?

10 A. Yes.

11 Q. Okay. Did you think that having sex for
12 money was illegal if you were under 18?

13 A. Yes.

14 Q. What made you think that it was illegal
15 for underage people to have sex for money?

16 A. Common sense and, yeah.

17 Q. Had you ever been arrested before
18 November 7, 2014?

19 A. No.

20 Q. Had you ever been in trouble with the
21 law for any reason before November 7, 2014?

22 A. No.

23 Q. I think there was a record from 2013 if
24 I'm remembering correctly --

1 A. Um-hum.

2 Q. -- that you went AWOL from one of your
3 locations where you were assigned.

4 A. Yeah.

5 Q. You know what AWOL means; right?

6 A. Yeah.

7 Q. What does it mean to you?

8 A. When you leave without permission.

9 Q. Okay. Did you get in trouble with any
10 law enforcement for leaving one of your
11 appointed locations through DHS without
12 permission?

13 A. No.

14 Q. Nobody punished you for that?

15 A. No.

16 Q. So as of today, August 23rd, 2018, you
17 had -- you've been arrested for prostitution
18 and getting into a fight outside of a movie
19 theater and I think you said there was, was
20 there one other time or was that it?

21 A. That's it.

22 Q. Okay. Were you ever arrested for
23 robbery?

24 A. No.

1 Q. Burglary?

2 A. No.

3 Q. If there was something in your records
4 about being arrested for robbery, that would
5 be an error?

6 A. Yes.

7 Q. Did you ever keep a diary or a journal?

8 A. No.

9 Q. Did you use social media like Facebook,
10 Twitter, Instagram, Snapchat?

11 A. Just Facebook.

12 Q. Did you ever talk about Daiquan or
13 anything that was going on in your life when
14 you were having sex for money, did you ever
15 talk about it on Facebook?

16 A. No.

17 Q. Were you and Daiquan Facebook friends?

18 A. No, not at first.

19 Q. Eventually you became Facebook friends?

20 A. Yes.

21 Q. Is it safe to say you're not Facebook
22 friends anymore?

23 A. No.

24 Q. You're not?

1 A. No, we're not.

2 Q. Are you and Malik Facebook friends?

3 A. No.

4 Q. Do you use Facebook very much at all?

5 A. No.

6 Q. I understand you, when you were young
7 you used to live in Virginia; is that right?

8 A. Yes.

9 Q. How old were you when you lived in
10 Virginia?

11 A. Eight until twelve.

12 Q. What were those years like? Tell me
13 about those years.

14 A. It was bad.

15 Q. How so?

16 A. I was being molested the whole time.

17 Q. By Mr. Threats?

18 A. Yes.

19 Q. He started molesting you at age eight?

20 A. Yes.

21 Q. And that lasted through age twelve?

22 A. Yes.

23 Q. Did you tell your mom about it?

24 A. Yes.

1 Q. What did she do?

2 A. Nothing at first.

3 Q. At first? Did she eventually do
4 something?

5 A. (Witness nodding head.)

6 Q. What did she do?

7 A. She just left.

8 Q. Okay. So that's when you left Virginia?

9 A. No. When we moved back to Philly he was
10 still coming around.

11 Q. So when you moved back to Philly at
12 age -- you were twelve?

13 A. Yes.

14 Q. Was he still molesting you at that
15 point?

16 A. Yes.

17 Q. When did he finally stop and why? I
18 mean, what stopped him?

19 A. Just him and my mom breaking up.

20 Q. Did your mom ever call the police on
21 him?

22 A. No.

23 Q. Did you ever tell anyone other than your
24 mom that he was molesting you?

1 A. Yes.

2 Q. Who did you tell?

3 A. My godmother at the time and that was
4 it.

5 Q. Who is your godmother?

6 A. Her name is Adrienne Wright, with a W,
7 Carter.

8 Q. Are you -- is she still in your life?

9 A. Not really, no.

10 Q. Does she live in Philly?

11 A. I don't know.

12 Q. So if you needed something, if you
13 needed help, could you call on her?

14 A. Most likely, yes.

15 Q. Do you have a phone number for her?

16 A. Yes.

17 Q. Okay. But you're just not sure where
18 she lives?

19 A. No. I haven't spoke to her in a while.

20 MR. BEZAR: Try to keep your
21 voice up, [REDACTED]

22 THE WITNESS: Okay.

23 BY MS. O'CONNELL:

24 Q. Does she know anything about your

1 trafficking case?

2 A. Yes.

3 Q. Did you tell her about it?

4 A. No.

5 Q. How does she know about it?

6 A. My mom.

7 Q. Does your mom keep in touch with
8 Adrienne?

9 A. I don't know.

10 Q. Do you know in which correctional
11 institution Daiquan Davis sits today?

12 A. No.

13 Q. I saw something in your records about,
14 and I'm only laughing because I'm visualizing
15 this stack of records, about an incident when
16 you were young where you set fire to
17 something. Do you remember that?

18 A. Yes.

19 Q. What -- tell me about that. How old
20 were you and what was the situation?

21 A. I was nine and I was just standing in my
22 mom kitchen and just like burning paper cups.
23 That was it.

24 Q. Why?

1 A. I don't know. I was curious.

2 Q. The records mention that you heard --
3 heard voices. Does that sound familiar to
4 you?

5 A. Um-hum.

6 Q. You remember hearing voices?

7 A. No.

8 Q. You remember telling somebody you heard
9 voices?

10 A. Yes.

11 Q. Who did you tell that you heard voices?

12 A. My therapist at the time.

13 Q. But you didn't really hear voices?

14 A. No.

15 Q. Why did you tell your therapist you hear
16 voices?

17 A. My mom.

18 Q. Your mom? What about your mom?

19 A. She would like tell me tell the doctor
20 and then I would be on medi -- I was on
21 medication, you know, so --

22 Q. So your mother told you to lie to the
23 doctor?

24 A. (Witness nodding head.)

1 Q. Why?

2 A. I don't know.

3 Q. And then the doctor put you on
4 medication?

5 A. Yes.

6 Q. Do you remember what kind it was?

7 A. Concerta and Seroquel and lithium.

8 Q. Did those medications help you?

9 A. No.

10 Q. What did -- what was the effect they had
11 on you?

12 A. Concerta, I couldn't eat. I couldn't
13 keep anything down. I was losing a lot of
14 weight. Seroquel, I would sleep too hard,
15 wouldn't be able to get up for school.
16 Lithium didn't do anything. I don't even
17 know. It didn't do anything for me at all.
18 It was just like eating a piece of candy.
19 Nothing happened.

20 Q. How long were you on these drugs?

21 A. A few years. I would say about five,
22 six.

23 Q. All right. So from nine until about 14
24 or 15?

1 A. 13.

2 Q. 13, okay. And you started when you were
3 nine?

4 A. Yes. Eight, eight.

5 Q. Eight to 13. So that's about the time
6 span when Mr. Threats was abusing you; is
7 that right?

8 A. Yes.

9 Q. There was mention of you putting a
10 pillow over your sister's face at one point.
11 Do you recall doing that?

12 A. No.

13 Q. No? Do you recall attacking your sister
14 in any way?

15 A. No.

16 Q. Have we talked about your sister here
17 today?

18 A. No.

19 Q. No? What sister was living with you in
20 Virginia?

21 A. Both Adwoa and Akua.

22 Q. And you don't recall trying to hurt
23 either one of them?

24 A. No.

1 Q. Did you and your mom get along when you
2 were little?

3 A. Not really.

4 Q. No? Were you diagnosed with
5 schizophrenia?

6 A. No.

7 Q. You don't recall being told that?

8 A. No.

9 Q. Who diagnosed you with PTSD?

10 A. Um, Vision Quest, a therapist I had in
11 Vision Quest after I was arrested for the
12 prostitution.

13 Q. You don't recall ever having been
14 diagnosed with PTSD as a child?

15 A. No.

16 Q. When you were living in Virginia, do you
17 recall your mom taking knives out of the
18 house, taking anything sharp out of the
19 house?

20 A. No.

21 Q. You're kind of smiling. Why are you
22 kind of smiling?

23 A. Because it's not true. It's just, it's
24 a little upsetting, not against you, but just

1 the fact that that's even there. It's lies.

2 Q. So medical records that date back to
3 2010 are, you're upset that they're saying
4 things that you don't recall as being true?

5 A. It's not that I don't recall, I didn't
6 do it.

7 Q. Do you recall refusing to go into a
8 bathtub because voices told you your powers
9 would be taken away?

10 A. No.

11 Q. These notes say that your mom when she
12 was pregnant with you, the reason she was
13 pregnant was because of rape. Do you -- had
14 you heard that before?

15 A. No.

16 Q. Had she ever talked to you about that?

17 A. No. I know who my father is. No.

18 Q. Today do you have a good relationship
19 with your mom?

20 A. No.

21 Q. No? You live with her, but you don't
22 get along very well?

23 A. No.

24 Q. Does your mom work?

1 A. No.

2 Q. Is she on disability?

3 A. Yes.

4 Q. I think I saw a reference to her having
5 rheumatoid arthritis; is that right?

6 A. Yes.

7 Q. Do you help her out a lot around the
8 house?

9 A. Yes.

10 Q. Did you at one point when you were
11 younger play violin?

12 A. Yes.

13 Q. How long did you play violin?

14 A. Eight years.

15 Q. Were you pretty good at it?

16 A. Yeah.

17 Q. When is the last time you played violin?

18 A. Um, I was going to Penn Alexander
19 Elementary.

20 Q. So you haven't played in a while?

21 A. No.

22 Q. I'm seeing diagnoses of, and this is
23 2010, mood disorder, psychotic disorder,
24 ADHD. Does any of that sound familiar to

1 you?

2 A. Yes.

3 Q. Which? All of them?

4 A. ADHD.

5 Q. ADHD, you recall being diagnosed with
6 that?

7 A. Yes.

8 Q. Do you recall being on any medication
9 for ADHD?

10 A. Concerta.

11 Q. When you were younger how were your
12 grades?

13 A. Good.

14 Q. Yeah? Did you ever fail any classes?

15 A. No.

16 Q. I apologize if this has been asked
17 already. You had, and I'm not going to go
18 into details, but you had had sex before you
19 were trafficked by Mr. Davis; correct?

20 A. Yes.

21 Q. Okay. Did you ever have any like sex
22 education in school, anything like that?

23 A. Yes.

24 Q. Do you recall what school?

1 A. I was in the fifth, George Washington
2 Carver Elementary.

3 Q. Did they teach you good touch, bad
4 touch, what consent is, what consent -- what
5 nonconsent is, things like that?

6 A. No.

7 Q. No? What did they teach you?

8 A. They just taught us about our menstrual
9 and saying, oh, you can get pregnant if you
10 don't use a condom.

11 Q. Did your mom ever talk to you about sex?

12 A. Yes.

13 Q. What did she tell you?

14 A. If I have sex I'm going to bleed out and
15 die.

16 Q. You're going to bleed out and die?

17 A. Yes.

18 Q. How old were you when she told you that?

19 A. 14.

20 Q. What did she mean?

21 A. Well, um --

22 MR. BEZAR: Do you know what she
23 meant?

24 THE WITNESS: No.

1 MR. BEZAR: She's going to be here
2 tomorrow so you can ask her.

3 MS. O'CONNELL: I can ask her. I
4 can ask her tomorrow.

5 BY MS. O'CONNELL:

6 Q. When you first met Daiquan at Sana's
7 house, what did he seem like to you? What
8 was his personality like?

9 A. He seemed very money hungry, impatient
10 but easygoing at the same time, like he had
11 like a -- like a, I guess like a, kind of
12 like a charm to him.

13 Q. Like a player?

14 A. Yes.

15 Q. Did he dress the part? Did he have nice
16 kicks and good clothes?

17 A. Yes.

18 Q. Did he look well kept?

19 A. Yes.

20 Q. Was he there with other friends?

21 A. No.

22 Q. Just him and Sana and your sister?

23 A. Yes.

24 Q. And you?

1 A. Yes.

2 Q. Okay. What was your conversation on
3 that first day at Sana's house with Daiquan?

4 A. Um, he asked me if I wanted to make some
5 extra cash, and I said, Sure, and then he was
6 basically saying, You don't have to do what
7 your sister did the other day, you could just
8 talk to weird old guys with fetishes for a
9 hour or two and I'll give you a couple
10 dollars, and I said, Okay.

11 Q. What did he mean you didn't have to do
12 what your sister did?

13 A. Have sex with men for money.

14 Q. How long had your sister been having sex
15 with men for money, do you know?

16 A. I don't know.

17 Q. Did you know that she was?

18 A. No, until -- until that day I was at the
19 hotel.

20 Q. So when he -- when you were at Sana's
21 house and he said, You don't have to do what
22 your sister did for money, what did you think
23 he meant?

24 A. I don't know until he said it, no.

1 Q. So when he said, You don't -- you can
2 just talk to old men, you don't have to do
3 what your sister does, what did you think
4 your sister was doing?

5 A. Having sex with men for money.

6 Q. Okay. And to your -- and how old was
7 your sister at the time?

8 A. 20, 21.

9 Q. Okay. So she was of age. Did you think
10 that what your sister was doing was illegal?

11 MS. MARKS: Objection.

12 THE WITNESS: I mean, no.

13 BY MS. O'CONNELL:

14 Q. You didn't think she could get in
15 trouble for it?

16 A. No.

17 Q. Do you ever watch television shows about
18 cops and --

19 A. Yeah.

20 Q. -- prostitutes and pimps and stuff like
21 that?

22 A. Yeah, um-hum.

23 Q. What did you -- did you ever see cop
24 shows where they're arresting hookers and

1 johns?

2 A. Um-hum.

3 Q. Did you think that that could happen to
4 your sister?

5 A. Yeah.

6 Q. Yeah? Did you think that could happen
7 to you?

8 A. Yeah.

9 Q. So if cops on TV were arresting women
10 for having sex for money, they could probably
11 do it to your sister, too?

12 A. Yeah.

13 Q. Did you think what Daiquan was doing was
14 illegal?

15 MS. MARKS: Objection. Can you
16 clarify for me what he was doing?

17 MS. O'CONNELL: Sure.

18 BY MS. O'CONNELL:

19 Q. Did you think that Daiquan having girls
20 have sex for money was illegal or legal?

21 A. Depending on the age.

22 MS. MARKS: Let me object to the
23 form. You can answer.

24 THE WITNESS: Depending on the

1 age.

2 BY MS. O'CONNELL:

3 Q. Okay. Which is what we talked about
4 earlier?

5 A. Yes.

6 Q. And Daiquan was 21; right?

7 A. Yes.

8 Q. Did you ever meet any of Daiquan's
9 friends?

10 A. No. Well, the last time we were at the
11 Neshaminy Inn, there was a guy and a girl on
12 the bus, and he knew the guy, and that was
13 about it. I didn't get the guy's name or
14 anything.

15 Q. So you were on the bus to the way -- on
16 the way to Neshaminy Inn?

17 A. Um-hum.

18 Q. So you were not at the Neshaminy with
19 him, with this guy?

20 A. No.

21 Q. And you don't know what his name was?

22 A. No.

23 Q. There was -- correct -- is this a true
24 statement, you were never at the Neshaminy

1 Inn in a room with another woman; is that
2 correct?

3 A. Yes, that's correct.

4 Q. Okay. You told us about -- well, let me
5 ask you this way. How many times do you
6 recall going to the Neshaminy Inn to have sex
7 with men for money?

8 A. Three times.

9 Q. Three times. Okay. Let's go through
10 these one by one.

11 All right. The first time that
12 you recall being at the Neshaminy Inn I think
13 you said was mid to late October; is that
14 right?

15 A. Yes.

16 Q. And that was one night?

17 A. Yes.

18 Q. You got -- how did you get there?

19 A. SEPTA.

20 Q. And tell me again the route you took.

21 A. 14.

22 Q. So you got on the BSL?

23 A. The BSL is the Broad Street Line.

24 Q. I thought you said something about --

1 A. No. The first time I was at the
2 Neshaminy Inn, I was already at the
3 Roosevelt, so I was already close by so I --
4 so I just, you know.

5 Q. Got you. I'm thinking of another time
6 then. So you took the bus from the Roosevelt
7 to the Neshaminy Inn?

8 A. Yes.

9 Q. Is the Roosevelt Inn the same town?

10 A. Yes.

11 Q. How far away?

12 A. Hmm, I would say about fifteen minutes.

13 Q. A fifteen-minute bus ride?

14 A. Yeah.

15 Q. What time of day was it?

16 A. Daytime.

17 Q. Do you recall an approximate time?

18 A. 3:00.

19 Q. Where does the bus drop off, the 14 drop
20 off for you to get to the Neshaminy?

21 A. Right in front of the Neshaminy.

22 Q. On Old Lincoln Highway?

23 A. Yes.

24 Q. So when it drops you off, you're

1 probably on the corner of Lincoln Highway and
2 Old Lincoln Highway?

3 A. Yes.

4 Q. Which is the front of Neshaminy Inn;
5 correct?

6 A. Yes.

7 MS. O'CONNELL: I have some
8 copies here. I'll have you mark this. I'll
9 have you look at it. I'm going to sit -- is
10 it all right if I come near to you --

11 THE WITNESS: Yes.

12 MS. O'CONNELL: -- to ask you a
13 question?

14 THE WITNESS: Yes.

15 MS. O'CONNELL: There is no
16 question pending right now, so I'm going to
17 have the videographer change the tape.

18 VIDEO SPECIALIST: Going off the
19 video record at 4:53. This is the end of
20 tape three.

21 (Discussion held off the record.)

22 (Exhibits EB-7 and EB-8 were
23 marked for identification.)

24 VIDEO SPECIALIST: We're back on

1 the video record at 5:02. This is the start
2 of tape four.

3 BY MS. O'CONNELL:

4 Q. Okay. Ms. [REDACTED] I have here a Google
5 Maps image of the Neshaminy Inn.

6 A. Yes.

7 Q. Okay. I believe it's 2345 Old Lincoln
8 Highway is the address.

9 Do you recognize this layout at
10 all or Old Lincoln and Old Trevoise Road?

11 A. Yes.

12 Q. Okay. What I'd like you to do for me --
13 we'll deal with that second. Yeah, just
14 let's look at this one for the time being.

15 What I'd like you to do for me is
16 with a number one, a number two and a number
17 three, show me, for example, number one, the
18 first time you went to Neshaminy Inn what
19 room you stayed in. Can you do that? Can
20 you show --

21 A. You want me to show you from here?

22 Q. From here. Is there a way for you to
23 show what part of the --

24 A. Oh.

1 Q. Do you see what I mean?

2 A. The last -- the last one all the way on
3 the end right here on the top, on the top
4 floor right here (indicating).

5 Q. All right. Was that where you stayed
6 each time?

7 A. Yes.

8 Q. All right. So all three times you
9 stayed in that --

10 A. Yes.

11 Q. -- far corner on the left?

12 A. Yes.

13 Q. On the top or the bottom?

14 A. The top.

15 Q. The top, okay, great. Thank you. And
16 that was EB-7.

17 If we look at EB-8, can you mark
18 for me on here what -- where that room is?

19 A. (Witness complies.)

20 Q. Okay. Let's mark it a little bit
21 clearer.

22 A. Do you want me to --

23 Q. Maybe do a line.

24 A. -- do like a bigger line, too?

1 Q. Yeah, perfect.

2 A. (Witness complies.)

3 Q. Thank you. I appreciate it. Thanks.

4 Okay.

5 And that again was all three
6 times?

7 A. Yes.

8 Q. Can you show me on this, on EB-8, where
9 the office is?

10 A. Right there (indicating).

11 Q. Where that white, where that awning is?

12 A. Yes.

13 Q. Is that also where the beer store is or
14 the bar?

15 A. No, the beer -- yes, the bar is to
16 the -- to the Neshaminy Inn?

17 Q. Yes.

18 A. Yes, yes.

19 Q. So the office and the bar are basically
20 the same part of the building?

21 A. Yes.

22 Q. Now, when you went the first time and
23 Mr. Davis said stay away --

24 A. Um-hum.

1 MR. BEZAR: Objection to the
2 form.

3 BY MS. O'CONNELL:

4 Q. -- where did he tell you to wait?

5 A. Right here (indicating).

6 Q. Outside or inside?

7 A. Outside.

8 Q. In the parking lot?

9 A. Yes, over here (indicating).

10 Q. Okay. So did anybody from the office
11 see you standing out there in the parking
12 lot?

13 A. Yes.

14 Q. Who saw you?

15 A. It was a woman, a white woman.

16 Q. Can you describe her?

17 A. Sorry. Caucasian woman.

18 Q. White is not an insult. It's okay.

19 Excuse me. I'm going to just move back to my
20 seat.

21 Okay. So now is that where you
22 waited each of the three times that you went
23 to the Neshaminy?

24 A. No. The first two times I was standing

1 right there. The last time I was standing in
2 the middle of the parking lot.

3 Q. Okay. Each time you waited you were
4 basically in plain sight; correct?

5 A. Yes.

6 Q. And each of the three times was it
7 daylight?

8 A. Yes.

9 Q. Describe for me, you had started to
10 mention for me on your first visit to
11 Neshaminy there was a woman in the office?

12 A. Yes.

13 Q. Was there just one woman?

14 A. Yeah, that's all I seen, and I seen a --
15 yeah, that's all I seen.

16 Q. Okay. Can you describe her for me?

17 A. She was just Caucasian and I think she
18 had long hair that was brown, black. I don't
19 know.

20 Q. Tall, short?

21 A. Average height.

22 Q. Heavy, thin?

23 A. I think she was thin.

24 Q. Do you remember what color her hair was?

1 A. I think it was brown or black. It was
2 dark.

3 Q. Do you recall, could you tell from I
4 guess there was a window there, could you
5 tell how old she was?

6 A. She was young, like late 20's.

7 Q. How -- can you approximate for me how
8 far away you were from her? You were
9 outside, she was inside, but approximately
10 how many feet separated you?

11 A. I was directly outside of the window.

12 Q. So a matter of feet?

13 A. Yeah.

14 Q. Did you make eye contact with her?

15 A. I'm pretty sure I did, yes.

16 Q. Did you see a name tag?

17 A. Yes.

18 Q. Do you recall what it said?

19 A. No.

20 Q. You couldn't read it that far away?

21 A. No.

22 Q. What did her clothes look like?

23 A. I don't remember.

24 Q. Was it a uniform or street clothes, do

1 you remember?

2 A. Uniform.

3 Q. Do you remember what color it was?

4 A. No.

5 Q. Did you hear -- were you able to hear
6 anything from where you were standing?

7 A. No.

8 Q. I don't mean this as a joke, but do you
9 know how to read lips?

10 A. Sometimes.

11 Q. Okay. Were you able to see, to read any
12 conversation between Mr. Davis and this
13 clerk?

14 A. No.

15 Q. Approximately how long was he in the
16 office?

17 A. Ten minutes.

18 Q. Did you see what they were doing in
19 there or were you paying attention to
20 something else?

21 A. It was like, kind of like both. Like I
22 was looking around and then looking back and
23 I could see them talking, but I don't know
24 what.

1 Q. Did you see him hand over his ID?

2 A. Yes.

3 Q. Did you see her -- strike that.

4 When he came out of the office
5 what did you guys do?

6 A. Go straight to the room.

7 Q. Did you have any bags with you?

8 A. Just one.

9 Q. What kind of bag was it?

10 A. Like a overnight bag, like a really,
11 like a Victoria Secret overnight bag.

12 Q. Where were you coming from when you went
13 to Neshaminy?

14 A. Roosevelt Inn.

15 Q. The Roosevelt Inn from what I recall was
16 the first place you ever went to have sex
17 with men with Mr. Davis; is that right?

18 A. Yeah.

19 Q. And you spent one night there?

20 A. Yes.

21 Q. So when you went to Neshaminy, this was
22 essentially your second time --

23 A. Yes.

24 Q. -- having sex for money?

1 A. Yes.

2 Q. When you went to the Roosevelt that
3 first time you had a bag with you?

4 A. Yes.

5 Q. What was in that bag?

6 A. Some clothes, change of clothes,
7 hygiene, toothbrush, stuff like that, some
8 cash, some marijuana, condoms. That's about
9 it.

10 Q. When you went to the Roosevelt Inn, were
11 you expecting to have sex for money?

12 A. No.

13 Q. Why did your bag have condoms in it?

14 A. Oh, you mean like at the Roosevelt Inn?

15 Q. Um-hum.

16 A. Oh, no, I didn't have condoms in my bag.
17 I apologize.

18 Q. Okay. No, that's why we're clarifying.

19 A. No.

20 Q. So when you went to the Roosevelt Inn
21 that first time --

22 A. Yes.

23 Q. -- there were no condoms in your bag?

24 A. No.

1 Q. When did you get the condoms?

2 A. He went to go get them at the Wawas up
3 the street.

4 Q. While you were at the Roosevelt?

5 A. Yes.

6 Q. You had a change of clothes?

7 A. Yes.

8 Q. When you went to the Roosevelt that
9 first day, did you plan on staying overnight?

10 A. No.

11 Q. Why did you have a change of clothes in
12 your bag?

13 A. I always did. I was homeless basically,
14 so if I crash somewhere, I had what I had.

15 Q. Did you only have one change of clothes?

16 A. Yes, at that time, yes.

17 Q. Did you at any point, say, wash your
18 clothes, wash out your underwear, anything
19 like that?

20 A. Yes.

21 Q. Did you do that at Neshaminy or
22 afterwards?

23 A. I did it at Neshaminy, I believe. I
24 washed my underwear out, something like that.

1 Q. It sounds to me like there might have
2 been days that would go by when you were
3 wearing the same outfit; is that right?

4 A. Yes.

5 Q. Until that first time you went to, into
6 the city to get clothes?

7 A. Yes.

8 Q. All right. Neshaminy, now I know I'm
9 going back and forth between the Roosevelt,
10 but back to Neshaminy, can you describe, you
11 stayed in the same room all three times?

12 A. Yeah.

13 Q. What did the room look like inside?

14 A. It had two beds. When you come in it's
15 two beds to the right. It's a TV and ahead
16 is a microwave and then it's the bathroom.

17 Q. So it wasn't very big?

18 A. Um-um.

19 Q. So it was two, what, two queens, two
20 twins?

21 A. It looked like two queens.

22 Q. So they were big?

23 A. Yes.

24 Q. What about the color scheme? Do you

1 recall what the carpet color was?

2 A. Tan, red, those colors, nude.

3 Q. How about the bedspreads?

4 A. Tan, red, white.

5 Q. Any artwork on the walls that you
6 remember?

7 A. No.

8 Q. There wasn't any or you just don't
9 remember?

10 A. I don't remember.

11 Q. Do you recall whether, did you take a
12 shower while you were there?

13 A. Yes.

14 Q. Do you recall whether the shower had a
15 curtain or a glass door?

16 A. It had a curtain, a white curtain.

17 Q. Now, each of the three times you went,
18 nothing changed? It was all the same color
19 scheme?

20 A. Yes.

21 Q. At any time, any of the three times you
22 were at Neshaminy, did you ever talk to any
23 Neshaminy staff member?

24 A. No.

1 Q. Did you ever run into one?

2 A. Yes.

3 Q. Who did you run into?

4 A. Housekeeper, a woman.

5 Q. In your room?

6 A. Yes.

7 Q. So do you recall, was this the first
8 time, second time, third time?

9 A. No, I don't remember, but --

10 Q. You don't remember --

11 A. I ran into her. She didn't say anything
12 to me or anything like that.

13 Q. Did she knock on the door?

14 A. Um-hum.

15 Q. And you let her in?

16 A. Yes.

17 Q. Did you stay there?

18 A. Yes.

19 Q. While she cleaned?

20 A. Um-hum.

21 Q. Did you talk about anything?

22 A. No.

23 Q. Did she ask you your name?

24 A. No.

1 Q. Do you recall her name?

2 A. No.

3 Q. Do you recall what she looked like?

4 A. She was Spanish.

5 Q. Heavyset, thin? Anything else you can
6 tell me about her?

7 A. In between.

8 Q. Did she have a uniform?

9 A. Yes.

10 Q. Do you recall what it looked like?

11 A. I think she had on a white shirt.
12 That's all I remember.

13 Q. Okay. You don't recall pants or skirt
14 or anything like that?

15 A. No.

16 Q. Did you -- you didn't say anything to
17 her?

18 A. No.

19 Q. When she came in was there anything
20 lying around the room, any clothes or condoms
21 or --

22 A. Yes.

23 Q. -- weed?

24 A. Condoms and clothes, no weed.

1 Q. Did you pick up the condoms or did she?

2 A. She picked them up.

3 Q. While you were sitting there?

4 A. Yes.

5 Q. Whose clothes were there on the floor?

6 A. Me and Daiquan's.

7 Q. So were you -- were you naked or were
8 you wearing a change of clothes?

9 A. I was wearing a change of clothes.

10 Q. And Daiquan had a change of clothes as
11 well?

12 A. Yes.

13 Q. Was he in the room or was he at work?

14 A. He was at work.

15 Q. What did Daiquan carry his clothes in?

16 A. I think -- I don't know.

17 Q. But he had a change of clothes as well?

18 A. Yes.

19 Q. Did you, at any time you were at
20 Neshaminy did you ever look scared or
21 frightened, to your knowledge?

22 MR. BEZAR: Objection to the
23 form.

24 THE WITNESS: No.

1 BY MS. O'CONNELL:

2 Q. No? Let me put it this way. Did
3 anybody from Neshaminy Inn ever see you when
4 you think you might have looked scared?

5 MR. BEZAR: Objection to the
6 form.

7 THE WITNESS: I don't know.

8 BY MS. O'CONNELL:

9 Q. But you don't think you ever looked
10 scared at Neshaminy?

11 A. I don't know what scared really look
12 like.

13 Q. Did Mr. Davis ever threaten you with a
14 weapon at Neshaminy?

15 A. No.

16 Q. Did any john ever physically abuse you,
17 hurt you? I don't mean just having sex with
18 you, I mean like assault you at the
19 Neshaminy.

20 A. No.

21 Q. Did anybody at Neshaminy, to your
22 knowledge, hear you have conversations with
23 Mr. Davis?

24 A. No.

1 Q. Did you ever ask anybody at Neshaminy
2 for help?

3 A. No. A -- someone called from the front
4 desk one time and was saying something about
5 noise and that was about it.

6 Q. What visit was it?

7 A. I think it was the second time I was
8 there and like the phone rang. I picked it
9 up and it was like you're making too much
10 noise, can you be quiet, and I said yes and
11 hung up.

12 Q. What were you doing at the time that was
13 making so much noise?

14 A. I was having sex.

15 Q. So it wasn't a party?

16 A. No.

17 Q. So it sounds like maybe there was a
18 guest in the next room next to you?

19 A. Yes.

20 MR. BEZAR: Objection to form.

21 BY MS. O'CONNELL:

22 Q. Do you know who complained about the
23 noise?

24 A. No.

1 Q. Other than the cleaning lady, did
2 anybody else ever, from Neshaminy Inn, a
3 staff member, ever come to your room and
4 knock on the door?

5 A. No.

6 Q. When you would smoke weed at Neshaminy
7 Inn, would you stand out there on that
8 balcony?

9 A. No.

10 Q. Would you smoke in the room?

11 A. Yes.

12 Q. Do you happen to remember if it was a
13 smoking room or no smoking?

14 A. I think it was a smoking room.

15 Q. Do you know whether anybody from
16 Neshaminy Inn saw you actually enter -- well,
17 first of all, do you know the room number to
18 that room?

19 A. No, I don't remember.

20 Q. Okay. Do you know whether anybody from
21 Neshaminy Inn ever saw you actually walking
22 to that room with Mr. Davis?

23 A. Yes.

24 Q. Who was that?

1 A. Housekeeping.

2 Q. The same woman we talked about?

3 A. No.

4 Q. On what occasion was this that
5 housekeeping saw you walking with Mr. Davis?

6 A. I don't remember which time it was. I
7 don't.

8 Q. Was it just one time?

9 A. What, at that particular time that she
10 seen me?

11 Q. My question was -- and it's perfectly
12 right to be confused because it wasn't a very
13 good question. My question was, did any
14 staff member of Neshaminy Inn ever see you
15 actually enter the room with Mr. Davis like
16 together?

17 A. Yes.

18 Q. And you said a housekeeper did?

19 A. Yes.

20 Q. Do you recall was that the first time,
21 second time or third time you went to
22 Neshaminy?

23 A. No.

24 Q. You don't recall?

1 A. No.

2 Q. Do you recall what the circumstances
3 were? Was she trying to get in your room?
4 Did she see you from the parking lot? Do you
5 remember?

6 A. She was -- I guess she was just leaving
7 a room, I guess, from cleaning it and she
8 seen us coming up the steps. She just kept
9 going.

10 Q. Was that the only time you recall seeing
11 this housekeeper?

12 A. Yes.

13 Q. Do you recall what she looked like?

14 A. No.

15 Q. The woman who first checked you in the
16 first time when she first checked in
17 Mr. Davis --

18 A. Yes.

19 Q. -- did you ever see that same woman
20 again?

21 A. No.

22 Q. The housekeeper who came into your room
23 to clean --

24 A. Yes.

1 Q. -- when you were still in there, did you
2 ever see her again?

3 A. I don't know.

4 Q. And the housekeeper who saw you from
5 another room when she was leaving the room,
6 you never saw her again; correct?

7 A. No.

8 Q. That is correct?

9 A. Yes.

10 Q. When you left Neshaminy after each time,
11 would you just leave your key card, do you
12 remember, or do you recall how you left?

13 A. We'd just leave.

14 Q. Just leave everything and walk out?

15 A. Yes.

16 Q. Because you had already paid?

17 A. Um-hum.

18 Q. Just leave the keys in the room?

19 A. Yes.

20 Q. Would you -- was your transportation the
21 same each time to leave?

22 A. Sometimes it would be a cab or sometimes
23 it would be the bus.

24 Q. Well, let me ask you then. The first

1 time you left Neshaminy the day after your
2 first day, the morning after, how did you --
3 where did you go after that?

4 A. Motel 6.

5 Q. And what was your mode of
6 transportation?

7 A. SEPTA.

8 Q. And the stop was right around the inn;
9 correct?

10 A. Yes.

11 Q. The second time you left Neshaminy, what
12 was your mode of transportation?

13 A. Cab.

14 Q. And where were you going?

15 A. Motel 6.

16 Q. And the third time you left Neshaminy,
17 what was your mode of transportation?

18 A. Bus.

19 Q. Same bus stop?

20 A. Um-hum.

21 Q. So you just shut the door of the room.
22 It looks like was there a staircase right
23 there?

24 A. Um-hum.

1 Q. On the end?

2 A. Yes.

3 Q. And you would just walk down that
4 staircase?

5 A. Yes, and go across the street and get on
6 the bus.

7 Q. So you never even had to talk to
8 anybody?

9 A. No.

10 MS. O'CONNELL: I think that
11 might be all the questions I have. I'm going
12 to look over my notes. I think Mr. Greenberg
13 might have a couple follow-ups, but I
14 appreciate your time very much. Thank you.

15 THE WITNESS: You're welcome.

16 VIDEO SPECIALIST: Going off the
17 video record at 5:24.

18 (Discussion held off the record.)

19 VIDEO SPECIALIST: We are back on
20 the video record at 5:24.

21 BY MR. GREENBERG:

22 Q. Ms. [REDACTED] you were just asked some
23 questions about your medical history and
24 psychological history as a child and you

1 disagreed with some of the things that were
2 reported to treaters about your history.

3 I gather that you didn't agree
4 with some of the things your mother said
5 about you; am I right?

6 A. Yes.

7 Q. Is your mother generally an honest
8 person?

9 A. No.

10 Q. Switching gears, what do you remember
11 about the color scheme in the Motel 6 rooms?

12 A. It's like orange, orange, tan, cream
13 colors, nude colors.

14 Q. And what do you remember about the
15 layout of the furniture?

16 A. Two beds to the left, TV to the right,
17 sink, mirror straight ahead. To the left
18 there was --

19 Q. What?

20 A. To the left there was the bathroom right
21 next to the sink and the mirror.

22 Q. Were all the rooms just like that or
23 were some of them different?

24 A. They were just -- they were the same.

1 Q. Did you ever have any conversation with
2 any Motel 6 employees?

3 A. No.

4 Q. Do you think you ever displayed in the
5 presence of Motel 6 employees any fear that
6 they could see on you?

7 A. No.

8 Q. Now, you said you exchanged money with
9 Mr. Davis in the presence of Motel 6
10 employees.

11 A. Yes.

12 Q. Did you ever have any conversations with
13 him that they could hear, to the best of your
14 recollection?

15 A. Yeah, they were standing right there.

16 Q. What kinds of things did you and he talk
17 about?

18 A. Nothing. It would just be like give me
19 the money and I would give it to him and he
20 would take it.

21 Q. In order to pay for the room?

22 A. Yes.

23 Q. You told us about problems you had with
24 foster parent Brown.

1 A. Yes.

2 Q. Did you have any problems with Reena
3 Neeley?

4 A. Yes.

5 Q. Why problems did you have with her?

6 A. Trust. She was violating HIPAA rights,
7 my HIPAA rights.

8 Q. She was what?

9 A. She was violating HIPAA.

10 Q. How so?

11 A. She was telling my information about the
12 human trafficking case to people that
13 shouldn't know. She was exposing my
14 relationship issues with my baby father to
15 other people that shouldn't know. She just
16 was a bunch of drama.

17 Q. Did you and she argue?

18 A. Yes.

19 Q. And how did you part?

20 A. Say that again.

21 Q. How did you part ways? Was it a
22 friendly parting or an unfriendly parting?

23 A. What do you mean by that?

24 Q. When you finished living in her place --

1 A. Um-hum.

2 Q. -- was it an unfriendly departure or a
3 friendly parting of the ways?

4 A. It was a friendly departure.

5 Q. It was?

6 A. Yes.

7 Q. Did you ever ask any Motel 6 employees
8 for help?

9 A. No.

10 Q. Did you have problems with the way you
11 were treated at Vision Quest?

12 A. Yes.

13 Q. What problems?

14 A. Just not proper care.

15 Q. How?

16 A. You said Vision Quest; right?

17 Q. Yes.

18 A. Yeah, not proper care. They would, if
19 you complained about something to medical or
20 just anything, it would take however long
21 until they felt like addressing the
22 situation.

23 Q. Anything else?

24 A. It was very unsanitary, very unsanitary

1 building.

2 Q. It was dirty?

3 A. Yes.

4 Q. Where?

5 A. Everywhere.

6 Q. Where you slept, where you used the
7 bathroom?

8 A. Yes, everywhere.

9 Q. Where you ate?

10 A. Yes.

11 Q. It was dirty everywhere?

12 A. Yes.

13 Q. And you said that you didn't like or you
14 were unhappy with the Villa because they kept
15 telling you you would be going home and they
16 lied to you?

17 A. Yes.

18 Q. Do you have any other problems with the
19 Villa?

20 A. Um, I had some altercations.

21 Q. With other?

22 A. Girls and staff.

23 Q. And staff?

24 A. Yeah.

1 Q. What were the altercations about?

2 A. Just the staff were very, took advantage
3 of the power they were given, so they would
4 taunt you, tit for tat, make friends with a
5 girl they know that don't like you and
6 manipulate them to start with you, things
7 like that.

8 Q. Did you have any problems with the
9 Northern Home?

10 A. Yes.

11 Q. What problems did you have there?

12 A. I was attacked by a girl when I was
13 pregnant with my daughter.

14 Q. Another resident?

15 A. Yes.

16 Q. Did you have any other problems there?

17 A. No.

18 Q. Did you have any problems at the Lee
19 Preparatory Academy?

20 A. No.

21 Q. What about the New Direction Shelter,
22 5201 Old York Road? Is that Vision Quest?

23 A. Yeah, that's Vision Quest.

24 Q. Did you have any problems with the Doris

1 Clark House in Lake Ariel?

2 A. No. I mean, I had gotten into an
3 altercation with a housemate, but yeah.

4 Q. Were you treated well there?

5 A. Yeah.

6 Q. What's JJ Center, 48th and Haverford
7 Avenue in Philadelphia? Do you recognize
8 that?

9 A. Yes.

10 Q. What do you call that place?

11 A. The Youth, Youth Study Center.

12 Q. Were you treated well there?

13 A. Yes.

14 Q. You spent a couple of months with a
15 Regina Ndeto, N-D-E-T-O, 424 Wynnefield
16 Avenue in Upper Darby.

17 A. Yes.

18 Q. Do you recall that in 2013?

19 A. Yes.

20 Q. Was that a foster home?

21 A. Yes.

22 Q. Did you have any problems with her?

23 A. Yes.

24 Q. What problems?

1 A. Her daughter, she tried to fight me
2 once.

3 Q. Any other problems?

4 A. Bedbugs. Bedbugs.

5 Q. How old was the daughter that tried to
6 fight you?

7 A. 24.

8 Q. What contact did you have, if any at
9 all, with the housekeepers at the Motel 6?

10 A. What do you mean by that?

11 Q. Did you have any dealings with the
12 housekeepers at the Motel 6?

13 A. No.

14 Q. You saw them?

15 A. Yeah.

16 Q. You did or you didn't?

17 A. I did.

18 MR. BEZAR: Keep your voice up,

19

20 THE WITNESS: Yes, I did.

21 BY MR. GREENBERG:

22 Q. You didn't talk to them at all?

23 A. No.

24 Q. They didn't talk to you?

1 A. No.

2 MR. GREENBERG: Those are all my
3 questions.

4 MR. BEZAR: Thank you.

5 MS. O'CONNELL: Do you have any
6 follow-up, Nadeem?

7 MR. BEZAR: No. I'm so sorry.
8 Everyone was looking at me.

9 VIDEO SPECIALIST: This ends the
10 videotape deposition of [REDACTED] on
11 August 23rd, 2018, at 5:33 p.m.

12 (Witness excused.)

13 - - -

14 (Deposition concluded at 5:33
15 p.m.)

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CERTIFICATE

I HEREBY CERTIFY that the proceedings, evidence and objections are contained fully and accurately in the stenographic notes taken by me upon the foregoing matter on Thursday, August 24, 2018 and that this is a true and correct copy of same.



Donna A. Bittner, RMR-CRR, CSR (NJ)

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